

1605 Vauxhall Road
Union, N.J. 07083
TEL: 908-687-6636
FAX: 908-687-6755
E-MAIL: Dewling@aol.com

Richard T. Dewling, Ph.D., P.E., DEE
CEO

Michael P. Bonchonsky, M.S., J.D.
President

Fred N. Rubel, M.S., QEP
Senior Associate & Director

David E. Breuer, B.C.E.
Kathryn Crumm, P.E.

Michael McCue, MChE., MBA., J.D.

Neil P. Mulvey, M.S.

Randy Vieser, P.E., DEE
Senior Associates

SENT VIA COURIER FOR HAND DELIVERY

July 19, 2006

Abdool Jabar
Environmental Engineer
Hazardous Waste Compliance Section
RCRA Compliance Branch
Division of Enforcement and Compliance Assistance
US Environmental Protection Agency – Region 2
22nd Floor
290 Broadway
New York, NY 10007-1866

Subject: Response to Notice of Violation / RCRA § 3007 Information Request
Elan Chemical Company, Inc.
Newark, NJ
EPA ID # NJD 042895680

Dear Mr. Jabar:

This letter and enclosed attachments are in response to the April 28, 2006 Notice of Violation / RCRA § 3007 Information Request letter received by Elan Chemical Company, Inc., Newark, NJ.

This submission includes two responses:

- Response to Alleged Notice of Violations (NOVs)
- Response to Information Request Letter (IRL)

Each response is organized by referencing the NOV or IRL item number as described in the April 28, 2006 letter from the USEPA. Where necessary attachments are enclosed to provide supporting documentation. Attachments are referenced in the response to a particular item number.

As you know, several of the alleged NOVs reference a lack of documentation. In fact, Elan had documentation showing that the requirements were met and provided documentation during the USEPA inspection. Elan's documentation was apparently rejected because of differences of opinion over format or level of detail. Contrary to the

cited NOV, Elan had appropriate documentation showing that the requirements were met. Items where Elan objects to an alleged NOV are noted in the "Response to Alleged NOVs" document.

While Elan is prepared to respond to any concerns the USEPA has regarding it's RCRA program, please note that the NJDEP, Bureau of Hazardous Waste Compliance & Enforcement has inspected Elan's facility in prior years (including 2003, 2004, and 2005) and has not cited Elan for violating hazardous waste regulations.

Thank you for the opportunity to prepare these responses and please call me at (908) 687-6636 if you have any questions or require additional information or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "N. P. Mulvey", with a long horizontal stroke extending to the right.

Neil P. Mulvey
Senior Associate

cc. Richard T. Dewling (w/o attach.)
Mary Guerrero, Elan Chemical Company, Inc. (w/attach.)
Jocelyn K. Manship, Elan Chemical Company (w/ attach.)

**RESPONSE TO NOTICE OF VIOLATION (NOV) / RCRA § 3007
INFORMATION REQUEST**

**ELAN CHEMICAL COMPANY, INC.
Newark, NJ**

RESPONSE TO ALLEGED NOVs

NOTE: Item numbers reference the NOV item as described in the April 28, 2006 NOV/IRL letter from the USEPA.

NOV ITEM NO. 1

Elan has identified each piece of equipment subject to 40 CFR § 265 Subpart BB as follows:

Valves

V-77-F
V-77-F-A
V-78-A
V-78-B
V-78-B-1
V-78-C
V-78-D
V-78-E
V-78-F
V-78-G
V-78-H

Pump

P-77

NOV ITEM NO. 2

Elan has established a procedure for performing monthly monitoring of valves and the pump in service handling hazardous waste. See Attachment 1 for a copy of the Monthly Monitoring Procedure, Equipment Repair Form, and Monthly Monitoring Log used for valves and P-77 handling hazardous waste. Monthly monitoring is scheduled to begin prior to August 1, 2006.

NOV ITEM NO. 3

§ 265.1052(a)(2) requires weekly visual inspection of pumps used in hazardous waste service. In accordance with NJ DPCC regulations, Elan performs daily visual inspections of the East Tank Farm, including Tank 78 and associated piping and valves for leaks. These daily inspections include P-77. See Attachment 2 for a copy of the procedure and record of daily inspections for CY-2005 and CY-2006 (thru 5/5/06). Thus, Elan performs the visual inspection more frequently (daily) than is required (weekly).

Note that the visual leak inspection of P-77 has been added to the Tank 78 Inspection Checklist. See Attachment 3 for a copy of the daily inspection checklist for Tank 78.

See Attachment 1 for a copy of the Monthly Monitoring Procedure, Equipment Repair Form, and Monthly Monitoring Log used for P-77 (pump used for hazardous waste transfers). Monthly monitoring is scheduled to begin prior to August 1, 2006.

NOV ITEM NO. 4

The three referenced open-ended valves/lines have been capped or removed.

NOV ITEM NO. 5

This item alleges a lack of documentation. In fact, Elan had documentation showing that the requirements were met and provided documentation during the USEPA inspection. Elan's documentation was apparently rejected because of differences of opinion over format or level of detail. Contrary to this item of the NOV, Elan had appropriate documentation showing that the requirements were met.

§ 265.1085(c)(4) requires visual inspections of tanks in service for hazardous waste. Initial and annual inspections are required. Elan performs monthly visual inspections of Tank 78. The monthly visual inspections check for:

- ☐ Leaks (from seals, gaskets, caps, plugs, etc.)
- ☐ Signs of shell distortions
- ☐ Signs of settlement
- ☐ Signs of corrosion
- ☐ Conditions of foundation
- ☐ Condition of paint coatings
- ☐ Condition of appurtenances

See Attachment 4 for documentation of the monthly visual inspections of Tank 78 performed in 2003, 2004, 2005, and 2006.

Additionally, Elan has established a separate record of annual visual inspection of Tank 78, showing the first such inspection in July 2006 (see Attachment 4).

NOV ITEM NO. 6

The containers identified in this item have been labeled as "hazardous waste containers."

NOV ITEM NO. 7

The containers identified in this item have been closed with lids or other covers.

NOV ITEM NO. 8

This item alleges a lack of documentation. In fact, Elan had documentation showing that the requirements were met and provided documentation during the USEPA inspection. Elan's documentation was apparently rejected because of differences of opinion over format or level of detail. Contrary to this item of the NOV, Elan had appropriate documentation showing that the requirements were met.

Elan has designated only one employee with responsibility for handling hazardous waste. The employee's name is Lavaud Therlonge and job title is "Waste Handler/Mechanical Helper." This employee is responsible for the transfer of hazardous waste into Tank 78 and for the transfer of hazardous waste from Tank 78 to the tank truck. Since hazardous waste transfers are made on a batch-basis, this responsibility can be performed by a single employee.

Initial training received by Mr. Therlonge included a 40-Hour Hazardous Waste Site Worker Training course. Refresher training included:

- ☐ RTK HAZCOM Training (MSDSs, safe handling of hazardous substances)
- ☐ Respirator Training
- ☐ Lockout/Tagout Training
- ☐ Confined Space Awareness Training
- ☐ Forklift Operator Training
- ☐ Blood borne Pathogen Awareness Training
- ☐ Good Manufacturing Practice (GMP) Training

See Attachment 5 for documentation on the training received as described above.

NOV ITEM NO. 9

This item alleges a lack of documentation. In fact, Elan had documentation showing that the requirements were met and provided documentation during the USEPA inspection. Elan's documentation was apparently rejected because of differences of opinion over format or level of detail. Contrary to this item of the NOV, Elan had appropriate documentation showing that the requirements were met.

The only potentially applicable characteristic of hazardous waste handled at Elan's Newark, NJ facility is ignitability and hazardous waste is contained only in Tank 78 (not in Tank 77). The primary hazards/properties therefore are fire and/or explosion related to a spill or release. There are no other unique hazards/properties related to the hazardous waste handled at the facility. The City of Newark Fire Department is the primary response organization for fire response. The City of Newark Fire Department is, of course, readily capable to respond to industrial fires. See Attachment 6 for a copy of a letter dated November 14, 2005 confirming that the City of Newark Fire Department will respond to any and all fire related emergencies or hazardous material incidents at Elan's Newark facility. Attachment 6 also includes a copy of a Hazardous Materials Facility

Permit issued by the City of Newark Fire Department on April 6, 2005. A fire inspector from the Fire Department conducts annual visits to the Newark site for inspection of the fire suppression systems.

Because the only potentially applicable characteristic is ignitability, there are no special hazards that require separate arrangements with the local Police Department and local hospitals. Thus, Elan has made appropriate arrangements with the only applicable agency, the Fire Department.

In addition to the written agreement with the City of Newark Fire Department, Elan has written agreements with two outside professional emergency response organizations, namely HMHTTC and S&D Environmental Services. Copies of these agreements are included in Attachment 6.

NJDEP, Bureau of Hazardous Waste Compliance & Enforcement has inspected Elan's facility in prior years (including 2003, 2004, and 2005) and has not cited Elan for violating these provisions.

NOV ITEM NO. 10

See response to item no. 9 above.

NOV ITEM NO. 11

This item alleges a lack of documentation. In fact, Elan had documentation showing that the requirements were met and provided documentation during the USEPA inspection. Elan's documentation was apparently rejected because of differences of opinion over format or level of detail. Contrary to this item of the NOV, Elan had appropriate documentation showing that the requirements were met.

In accordance with NJ DPCC regulations, Elan had a DPCC Plan in effect at the time of the inspection. The Plan included a list of emergency equipment. Elan also had a written *Contingency and Emergency Plan* which contained a list of the emergency equipment available for use at the Newark Facility. See Attachment 7 for the list of emergency equipment as detailed in the Plan, including emergency personal protective equipment, spill kit equipment, and warning protection devices. Included is a description of the equipment, quantity, and location. Attachment 7 also includes a list of fire extinguishers and location. As required by NJ DPCC regulations, the list is maintained and is reviewed and updated as necessary.

NOV ITEM NO. 12

This item alleges a lack of documentation. In fact, Elan had documentation showing that the requirements were met and provided documentation during the USEPA inspection. Elan's documentation was apparently rejected because of differences of opinion over format or level of detail. Contrary to this item of the NOV, Elan had appropriate documentation showing that the requirements were met.

In accordance with NJ DPCC regulations, Elan had a DPCC Plan in effect at the time of the inspection. The Plan included evacuation procedures. Elan also had a written *Contingency and Emergency Plan* which contains a written evacuation plan for Elan's Newark Facility. See Attachment 8 for a copy of the evacuation plan, emergency procedures, and notification procedures. As required by NJ DPCC regulations, an evacuation plan has always been available and is reviewed and updated as necessary.

NOV ITEM NO. 13

See Attachment 9 for a copy of the transmittal letter used to send a copy of Elan's *Contingency and Emergency Plan* to the City of Newark Fire Department. As explained in the response to item no. 9 above, the City of Newark Fire Department and Elan had a written agreement at the time of the inspection stating that the Fire Department will respond to any and all fire related emergencies or hazardous material incidents at Elan's Newark facility. The Plan was not transmitted to other agencies as the hazardous waste handled at Elan does not exhibit any characteristics that would require additional special handling or response.

NOV ITEM NO. 14

This item alleges a lack of documentation. In fact, Elan had documentation showing that the requirements were met and provided documentation during the USEPA inspection. Elan's documentation was apparently rejected because of differences of opinion over format or level of detail. Contrary to this item of the NOV, Elan had appropriate documentation showing that the requirements were met.

This item states that Elan had failed to make a hazardous waste determination of abandoned chemicals in two rooms adjacent to the R&D Laboratory. In fact, the chemicals stored in these two rooms were not 'abandoned,' but rather were purchased by Elan and stored for use in R&D activities. At the time of the USEPA site visit in April 2006, all of these chemicals were intended for use in R&D activities and none of these chemicals were intended for disposal.

However, following the USEPA site visits in April 2006, Elan reviewed the inventory of chemicals in the two storage rooms. After completing this review, some material was identified for disposal. These materials were subsequently identified, classified, and shipped off-site for disposal. See Attachment 10 for a copy of the manifest for these shipments.

For at least the last five years, all fluorescent tubes purchased at the facility are 'green-tipped' tubes. 'Green-tipped' tubes are sold with the specific feature that they will pass the TCLP test for metals. These tubes therefore are not considered a universal waste and can be disposed of as a non-hazardous waste. See IRL item no. 21 for additional detail.

NOV ITEM NO. 15

This item alleges a lack of documentation. In fact, Elan had documentation showing that the requirements were met and provided documentation during the USEPA inspection. Elan's documentation was apparently rejected because of differences of opinion over format or level of detail. Contrary to this item of the NOV, Elan had appropriate documentation showing that the requirements were met.

As explained in item no. 3 above, in accordance with NJ DPCC regulations, Elan performs daily visual inspections of the East Tank Farm, including Tank 78 and associated piping and valves for leaks. See Attachment 2 for a copy of the procedure and record of daily inspections for CY-2005 and CY-2006 (thru 5/5/06). Elan has records of these daily inspections dating back to 2002. Additionally, an Inspection Checklist for daily visual inspections of Tank 78 has been prepared and implemented. See Attachment 3 for a copy of the daily Inspection Checklist for Tank 78.

NOV ITEM NO. 16

See item no. 15 above. Note that Elan maintains the daily Inspection Checklist as well as other inspections of equipment handling hazardous waste in a *Tank 78 Inspection Log Book*.

RESPONSE TO ALLEGED NOVs
& IRLs

ATTACHMENT 1

Monthly Monitoring Procedure
Equipment Repair Form
Monthly Monitoring Log

Elan Chemical Company, Inc.
Newark, NJ

ELAN CHEMICAL COMPANY, INC.
Newark, NJ

RCRA HAZARDOUS WASTE MANAGEMENT UNIT

MONTHLY MONITORING PROCEDURES

OBJECTIVE

Perform monthly monitoring of valves and P-77 in service in the designated RCRA hazardous waste management unit. The purpose of the monthly monitoring is to identify potential leaks in the equipment. Note that handling of hazardous waste is performed as batch transfers (i.e., a non-continuous operation). As a batch operation, hazardous waste is only present in transfer lines during batch transfers. Monthly monitoring is therefore performed during batch transfers.

PROCEDURE

1. Using PID, determine background level and note on monitoring log. Background readings should be taken in the general vicinity of the valve/pump, but at least a distance of 10-ft. from the equipment.
2. Using PID instrument, check each designated valve and P-77 for leaks.
3. Document PID reading on monthly monitoring log, including date of reading.
4. Any reading greater than 10,000 PPM is considered a leak, requiring corrective action. The "Comments" section of the monthly log must be used to note leaking valves.
5. Leaks must be immediately reported to the Plant Engineer.
6. Within 5 calendar days of identifying a leaking, attempts at repair must be made, including:
 - ☐ Tightening of bonnet bolts
 - ☐ Replacement of bonnet bolts
 - ☐ Tightening of packing gland nuts
 - ☐ Injection of lubricant into lubricated packing
7. All leaking valve must be repaired within 15 calendar days of discovery.
8. Use the *Equipment Repair Form* to document the repair of the leaking equipment.

NOTE: As permitted in § 265.1057(c), monitoring of valves and P-77 can be performed quarterly if no leaks are detected for two successive months.

ELAN CHEMICAL COMPANY, INC.
Newark, NJ

RCRA HAZARDOUS WASTE MANAGEMENT UNIT

EQUIPMENT REPAIR FORM

Equipment Identification	
Date Leak Detected	
Description Initial Repair <i>(Must be performed within 5-days of leak detection date).</i>	
Confirmation that Leak has been repaired <i>(Must be within 15-days of leak detection date).</i>	
Prepared by: <i>(Include printed name and signature).</i>	
Date:	

ELAN CHEMICAL COMPANY, INC.

Newark, NJ

RCRA HAZARDOUS WASTE MANAGEMENT EQUIPMENT LOG

MONTHLY MONITORING LOG

YEAR:

	JAN.	FEB.	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT.	OCT.	NOV.	DEC.
DATE												
BACK-GROUND												
VALVES												
V-77-F												
V-77-F-A												
V-78-A												
V-78-B												
V-78-B-1												
V-78-C												
V-78-D												
V-78-E												
V-78-F												
V-78-G												
V-78-H												
PUMP												
P-77												

COMMENTS:

RESPONSE TO ALLEGED NOV_s
& IRL_s

ATTACHMENT 2

Daily Inspection Records for Tank 78
(2006, 2005)

Elan Chemical Company, Inc.
Newark, NJ

Elan Chemical Company Procedure for Daily Inspections

In Tank Farms:

Check all valves

Note water accumulation in diked areas, any odor or sheen ?

Check walls for cracks

East Tank Farm – Check TK#78 (Hazardous Waste)

Check piping, valves for leaks

Observe level on gauge

Drum Storage Areas:

Check for leaking or swollen drums

Observe racks for damage

Note water accumulation

DAILY INSPECTION LOG

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S.Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
3/16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
3/17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
3/20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
3/27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
29	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
30	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
31	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4/3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4-4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4-5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4-6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4-7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4-10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4-11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4-12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
19	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	* Pond out Raw water	Bu
24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
25	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
26	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
5-1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu
5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Bu

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S. Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
1/25/06	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
26	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
30	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
31	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
2/1/06	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
20 - OCF	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
3/1/06	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S. Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
11/29/05	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
30	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
12/1/05	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
19	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
1/3/06	OFF	Rel	SHUT DOWN	✓	✓	✓	✓	✓	✓	✓		
4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
16	OFF	✓	✓	✓	✓	✓	✓	✓	✓	✓		
17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
19	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S. Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
10/7/05	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
10 - JFC												
11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
19	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
25	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
26	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
31	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
11/1/05	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

DAILY INSPECTION LOG

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S. Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
8/18/05	/	/	/	*	/	/	/	/	/	/	FX RACK	
8/19	/	/	/	/	/	/	/	/	/	/		
22	/	/	/	/	/	/	/	/	/	/		
23	/	/	/	/	/	/	/	/	/	/		
24	/	/	/	/	/	/	/	/	/	/		
25	/	/	/	/	/	/	/	/	/	/		
26	/	/	/	/	/	/	/	/	/	/		
29	/	/	/	/	/	/	/	/	/	/		
30	/	/	/	/	/	/	/	*	/	/	UNSC & GATE OPEN ON MANUAL	
31	/	/	/	/	/	/	/	/	/	/		
9/1/05	/	/	/	/	/	/	/	/	/	/		
2	/	/	/	/	/	/	/	/	/	/		
5	DEC	/	/	/	/	/	/	/	/	/		
6	/	/	/	/	/	/	/	/	/	/		
7	/	/	/	/	/	/	/	/	/	/		
8	/	/	/	/	/	/	/	/	/	/		
9	/	/	/	/	/	/	/	/	/	/		
12	/	/	/	/	/	/	/	/	/	/		
13	/	/	/	/	/	/	/	/	/	/		
14	*	/	/	/	/	/	/	/	/	/	HIGH VOLTAGE IN DIST	
15	/	/	/	/	/	/	/	/	/	/		
16	/	/	/	/	/	/	/	/	/	/		
19	/	/	/	/	/	/	/	/	/	/		
20	/	/	/	/	/	/	/	/	/	/		
21	/	/	/	/	/	/	/	/	/	/		
22	/	/	/	/	/	/	/	/	/	/		
23	/	/	/	/	/	/	/	/	/	/		
26	/	/	/	/	/	/	/	/	/	/		
27	/	/	/	/	/	/	/	/	/	/		
28	/	/	/	/	/	/	/	/	/	/		
29	/	/	/	/	/	/	/	/	/	/		
30	/	/	/	/	/	/	/	/	/	/		
10/3/05	/	/	/	/	/	/	/	/	/	/		
4	/	/	/	/	/	/	/	/	/	/		
5	/	/	/	/	/	/	/	/	/	/		
6	/	/	/	/	/	/	/	/	/	/		

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

DAILY INSPECTION LOG

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S. Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
8/23/05	/	/	/	/	/	/	/	/	/	/		
23	/	/	/	/	/	/	/	/	/	*	HIGH WATER IN	
24	/	/	/	/	/	/	/	/	/	/		
27	/	/	/	/	/	/	/	/	/	/		
28	/	/	/	/	/	/	/	/	/	/		
29	/	/	/	/	/	/	/	/	/	/		
30	/	/	/	/	/	/	/	/	/	/		
7/11/05	/	/	/	/	/	/	/	/	/	/		
12	/	/	/	/	/	/	/	/	/	/		
13	/	/	/	/	/	/	/	/	/	/		
14	/	/	/	/	/	/	/	/	/	/		
15	/	/	/	/	/	/	/	/	/	/		
18	/	/	/	/	/	/	/	/	/	/		
19	/	/	/	/	/	/	/	/	/	/		
20	/	/	/	/	*	/	/	/	/	/		
21	/	/	/	/	/	/	/	/	/	/		
22	/	/	/	/	/	/	/	/	/	/		
25	/	/	/	/	/	/	/	/	/	/		
26	/	/	/	/	/	/	/	/	/	/		
27	/	/	/	/	/	/	/	/	/	/		
28	/	/	/	/	/	/	/	/	/	/		
29	/	/	/	/	/	/	/	/	/	/		
8/11/05	/	/	/	/	/	/	/	/	/	/		
2	/	/	/	/	/	/	/	/	/	/		
3	/	/	/	/	/	/	/	/	/	/		
4	/	/	/	/	/	/	/	/	/	/		
5	/	/	/	/	/	/	/	/	/	/		
8	/	/	/	/	/	/	/	/	/	/		
9	/	/	/	/	/	/	/	/	/	/		
10	/	/	/	/	/	/	/	/	/	/		
11	/	/	/	/	/	/	/	/	/	/		
12	/	/	/	/	/	/	/	/	/	/		
15	/	/	/	/	/	/	/	/	/	/		
16	/	/	/	/	/	/	/	/	/	/		
17	/	/	/	/	/	/	/	/	/	/		

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

ELAN CHEMICAL

DAILY INSPECTION LOG

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S.Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
5/3/05	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/19	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/25	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/26	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5/30	055	0	✓	✓	✓	✓	✓	✓	✓	✓		
5/31	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5-1-05	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6/21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

ELAN CHEMICAL

DAILY INSPECTION LOG

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S.Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
3/11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/29	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/30	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
3/31	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/19	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/25	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/26	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
4/29	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban
5/2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		Ban

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

ELAN CHEMICAL

DAILY INSPECTION LOG

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S.Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
11-23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
11-24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
11-29	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
11-30	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12-1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12-2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12-3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/29	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
12/30	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/13	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB
1/18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		SB

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

ELAN CHEMICAL

DAILY INSPECTION LOG

Date	N. Tk. Farm	E. Tk. Farm	Fin. Goods	Raw Mat.	W.I.P.	S.Tk. Farm	Process Areas	Security Fences Locks	Above Ground Piping	Load/Unload. Areas *	Notes	Initials
1/19	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
1/20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
1/21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
1/24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
1/25	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
1/26	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
1/27	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
1/28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
1/31	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/16	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/17	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/23	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/25	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
2/28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
3/1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
3/2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
3/3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
3/4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
3/7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
3/8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
3/9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP
3/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		BP

* Inspection of loading/unloading areas is performed daily and includes: integrity, deterioration, leaks, and flexible hose lines.

RESPONSE TO ALLEGED NOVs
& IRLs

ATTACHMENT 3

Daily Inspection Checklist for Tank 78
(2006)

Elan Chemical Company, Inc.
Newark, NJ

Inspection Check List - Tank 78 Hazardous Waste

	1	2	3	4	5	
Date	Overfill/spill control equipment are in good working order	Tank if free of corrosion	Tank yard is free of debris or standing water. There is no signs of hazardous waste in the overflow area.	There is no sign of erosion on or around the containment wall.	All pumps and piping are free of leaks and in good working condition.	
4/6/2006	x	x	x	x		BA
4/7/2006	x	x	x	x		BA
4/10/2006	x	x	x	x		BA
4/11/2006	x	x	x	x		BA
4/12/2006	x	x	x	x		BA
4/13/2006	x	x	x	x		BA
4/14/2006	x	x	x	x		BA
4/17/2006	x	x	x	x		BA
4/18/2006	x	x	x	x		BA
4/19/2006	x	x	x	x		BA
4/20/2006	x	x	x	x		BA
4/21/2006	x	x	x	x		BA
4/24/2006	x	x	x	x		BA
4/25/2006	x	x	x	x		BA
4/26/2006	x	x	x	x		BA
4/27/2006	x	x	x	x		BA
4/28/2006	x	x	x	x		BA
5/1/2006	x	x	x	x		BA

Inspection Check List - Tank 78 Hazardous Waste

	1	2	3	4	5	
Date	Overfill/spill control equipment are in good working order	Tank if free of corrosion	Tank yard is free of debris or standing water. There is no signs of hazardous waste in the overflow area.	There is no sign of erosion on or around the containment wall.	All pumps and piping are free of leaks and in good working condition.	
5/2/2006	x	x	x	x		BA
5/3/2006	x	x	x	x		BA
5/4/2006	x	x	x	x		BA
5/5/2006	x	x	x	x		BA
5/8/2006	x	x	x	x		BA
5/9/2006	x	x	x	x		BA
5/10/2006	x	x	x	x		BA
5/11/2006	x	x	x	x		BA
5/12/2006	x	x	x	x		BA
5/15/2006	x	x	x	x		BA
5/16/2006	x	x	x	x		BA
5/17/2006	x	x	x	x		BA
5/18/2006	x	x	x	x		BA
5/19/2006	x	x	x	x		BA
5/22/2006	x	x	x	x		BA
5/23/2006	x	x	x	x		BA
5/24/2006	x	x	x	x		BA

Inspection Check List - Tank 78 Hazardous Waste

	1	2	3	4	5	
Date	Overfill/spill control equipment are in good working order	Tank if free of corrosion	Tank yard is free of debris or standing water. There is no signs of hazardous waste in the overflow area.	There is no sign of erosion on or around the containment wall.	All pumps and piping are free of leaks and in good working condition.	
5/25/2006	X	X	X	X		BA
5/26/2006	X	X	X	X		BA
5/29/2006	Holiday					
5/30/2006	X	X	X	X		BA
5/31/2006	X	X	X	X		BA
6/1/2006	X	X	X	X		BA
6/2/2006	X	X	X	X		BA
6/5/2006	X	X	X	X		BA
6/6/2006	X	X	X	X		BA
6/7/2006	X	X	X	X		BA
6/8/2006	X	X	X	X		BA
6/9/2006	X	X	X	X		BA
6/12/2006	X	X	X	X		BA
6/13/2006	X	X	X	X		BA
6/14/2006	X	X	X	X		BA
6/15/2006	X	X	X	X		BA
6/16/2006	X	X	X	X		BA

Inspection Check List - Tank 78 Hazardous Waste

	1	2	3	4	5	
Date	Overfill/spill control equipment are in good working order	Tank if free of corrosion	Tank yard is free of debris or standing water. There is no signs of hazardous waste in the overflow area.	There is no sign of erosion on or around the containment wall.	All pumps and piping are free of leaks and in good working condition.	
6/19/2006	x	x	x	x		BA
6/20/2006	x	x	x	x		BA
6/21/2006	x	x	x	x		BA
6/22/2006	x	x	x	x		BA
6/23/2006	x	x	x	x		BA
6/26/2006	x	x	x	x		BA
6/27/2006	x	x	x	x		BA
6/28/2006	x	x	x	x		BA
6/29/2006	x	x	x	x		BA
6/30/2006	x	x	x	x		BA
7/3/2006	Holiday					
7/4/2006	Holiday					
7/5/2006	x	x	x	x	x	BA
7/6/2006	x	x	x	x	x	BA
7/7/2006	x	x	x	x	x	BA
7/10/2006	x	x	x	x	x	BA
7/11/2006	x	x	x	x	x	BA

Inspection Check List - Tank 78 Hazardous Waste

	1	2	3	4	5	
Date	Overfill/spill control equipment are in good working order	Tank if free of corrosion	Tank yard is free of debris or standing water. There is no signs of hazardous waste in the overflow area.	There is no sign of erosion on or around the containment wall.	All pumps and piping are free of leaks and in good working condition.	
7/12/2006	x	x	x	x	x	BA
7/13/2006	x	x	✓	x	x	BA
7/14/2006	✓	✓	✓	✓	✓	SD
7/17/2006						
7/18/2006						
7/19/2006						
7/20/2006						
7/21/2006						
7/24/2006						
7/25/2006						
7/26/2006						
7/27/2006						
7/28/2006						
7/31/2006						
8/1/2006						
8/2/2006						
8/3/2006						

RESPONSE TO ALLEGED NOV_s
& IRL_s

ATTACHMENT 4

Monthly Inspection Records for Tank 78
(2006, 2005, 2004, 2003)

Elan Chemical Company, Inc.
Newark, NJ

API 653 Monthly Inspection - Storage Tanks

Inspection Instructions: Routine monthly in-service inspections under API 653 requires tank owner/operators to conduct a close visual inspection from the ground of the exterior surface of each storage tank. Inspectors must be knowledgeable of the storage facility operations, the tank, and the characteristics of the product stored. Check each of the inspection items listed and date and initial where indicated. Note any inspection deficiencies below and initiate corrective actions as necessary.

Tank No.: 78-Haz. Waste

Inspection Year: 2006

Reference Standard: API 653 Sec. 4.3.1

Inspection Item	JAN.		FEB.		MARCH		APRIL		MAY		JUNE		JULY		AUG.		SEPT.		OCT.		NOV.		DEC.	
	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial
1. Signs of Leaks	1/5	ERS	2/4	ERS	3/14	ERS	4/3	ERS	5/1	ERS	6/15	ERS												
2. Signs of Shell Distortions		ERS		ERS		ERS		ERS		ERS		ERS												
3. Signs of Settlement		ERS		ERS		ERS		ERS		ERS		ERS												
4. Signs of Corrosion		ERS		ERS		ERS		ERS		ERS		ERS												
5. Condition of Foundation		ERS		ERS		ERS		ERS		ERS		ERS												
6. Condition of Paint Coatings		ERS		ERS		X		X		ERS		ERS												
7. Condition of Appurtenances		ERS		ERS		ERS		ERS		ERS		ERS												

DEFICIENCIES NOTED					CORRECTIVE ACTIONS INITIATED				
Inspection Date	Description				Date Completed	Actions Taken			
3/14	Needs Repainting				4/8/06	Painted			

API 653 Monthly Inspection - Storage Tanks

Tank No.: 78-Haz. Waste

Inspection Year: 2005

Reference Standard: API 653 Sec. 4.3.1

Inspection Instructions: Routine monthly in-service inspections under API 653 requires tank owner/operators to conduct a close visual inspection from the ground of the exterior surface of each storage tank. Inspectors must be knowledgeable of the storage facility operations, the tank, and the characteristics of the product stored. Check each of the inspection items listed and date and initial where indicated. Note any inspection deficiencies below and initiate corrective actions as necessary.

Inspection Item	JAN.		FEB.		MARCH		APRIL		MAY		JUNE		JULY		AUG.		SEPT.		OCT.		NOV.		DEC.	
	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial
1. Signs of Leaks					3/3	SKS	4/1	SKS	5/2	SKS	6/4	SKS	7/2	SKS					10/26	SKS				
2. Signs of Shell Distortions						SKS		SKS		SKS		SKS		SKS						SKS				
3. Signs of Settlement						SKS		SKS		SKS		SKS		SKS						SKS				
4. Signs of Corrosion						SKS		SKS		SKS		SKS		SKS						SKS				
5. Condition of Foundation						SKS		SKS		SKS		SKS		SKS						SKS				
6. Condition of Paint Coatings						SKS		SKS		SKS		SKS		SKS						SKS				
7. Condition of Appurtenances						SKS		SKS		SKS		SKS		SKS						SKS				

DEFICIENCIES AND CORRECTIVE ACTIONS				
Inspection Date	Description	Date Completed	Actions Taken	

API 653 Monthly Inspection - Storage Tanks

Inspection Instructions: Routine monthly in-service inspections under API 653 requires tank owner/operators to conduct a close visual inspection from the ground of the exterior surface of each storage tank. Inspectors must be knowledgeable of the storage facility operations, the tank, and the characteristics of the product stored. Check each of the inspection items listed and date and initial where indicated. Note any inspection deficiencies below and initiate corrective actions as necessary.

Tank No.: 78-Haz. Waste

Inspection Year: 2004

Reference Standard: API 653 Sec. 4.3.1

Inspection Item	JAN.		FEB.		MARCH		APRIL		MAY		JUNE		JULY		AUG.		SEPT.		OCT.		NOV.		DEC.	
	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial
1. Signs of Leaks	1/8	JS	2/10	JS	3/1	JS	4/6	JS	5/14	JS	6/3	JS	7/6	JS	8/4	JS	9/10	JS	10/4	JS	11/9	JS	12/14	JS
2. Signs of Shell Distortions		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS
3. Signs of Settlement		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS
4. Signs of Corrosion		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS
5. Condition of Foundation		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS
6. Condition of Paint Coatings		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS
7. Condition of Appurtenances		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS		JS

DEFICIENCIES NOTED				
Inspection Date	Description	Date Completed	Actions Taken	
1-8-04	Needs Repainting	8/10/04	Repainted	

API 653 Monthly Inspection - Storage Tanks

Inspection Instructions: Routine monthly in-service inspections under API 653 requires tank owner/operators to conduct a close visual inspection from the ground of the exterior surface of each storage tank. Inspectors must be knowledgeable of the storage facility operations, the tank, and the characteristics of the product stored. Check each of the inspection items listed and date and initial where indicated. Note any inspection deficiencies below and initiate corrective actions as necessary.

Tank No.: 78- HAZ. WAST

Inspection Year: 2003

Reference Standard: API 653 Sec. 4.3.1

Inspection Item	JAN.		FEB.		MARCH		APRIL		MAY		JUNE		JULY		AUG.		SEPT.		OCT.		NOV.		DEC.	
	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial	Date	Initial
1. Signs of Leaks	1/9/03	ERS	2/17/03	ERS	3/4/03	ERS	4/4/03	ERS	5/6/03	ERS	6/10/03	ERS	7/10/03	ERS	8/5/03	ERS	9/11/03	ERS	10/6/03	ERS	11/6/03	ERS	12/16/03	ERS
2. Signs of Shell Distortions		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS
3. Signs of Settlement		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS
4. Signs of Corrosion		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS
5. Condition of Foundation		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS
6. Condition of Paint Coatings		(ERS)		(ERS)		(ERS)		(ERS)		(ERS)		(ERS)		(ERS)		(ERS)		(ERS)		(ERS)		(ERS)		(ERS)
7. Condition of Appurtenances		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS		ERS

DEFICIENCIES NOTED					CORRECTIVE ACTIONS INITIATED/TAKEN				
Inspection Date	Description				Date Completed	Actions Taken			
1/9/03	Tank needs cleaning + painting								

RESPONSE TO ALLEGED NOV_s
& IRL_s

ATTACHMENT 5

Training Records for
Mr. Lavaud Therlonge
Waste Handler/Mechanical Helper

Elan Chemical Company, Inc.
Newark, NJ

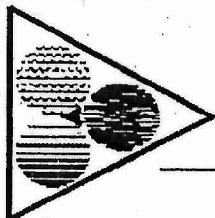
**JW Rufolo's
Institute for Occupational Safety and Health**

The Faculty
in recognition of successful completion of
the program of study required by
OSHA 29 CFR 1910.120(e)(2)
hereby confer upon
Lavaud Therlonge
the Certification of
40 Hour Hazardous Waste Site Worker
Given at Edison in the State of New Jersey.

For the Faculty
Joseph W Rufolo
Joseph W Rufolo
President & CEO



On this 31st
day of
July, 1997



RIGHT TO KNOW TRAINING

COMPANY: Elan Chemical

DATE: 11/29/05

INSTRUCTOR: Tatiana Melendez

1910.1200 (a) Purpose
1910.1200 (b) Scope
1910.1200 (c) Definitions
1910.1200 (d) Hazardous Determination
1910.1200 (e) Written Hazardous
Communication Program
1910.157 Fire Extinguisher Training

1910.1200 (f) Labels and Other Forms of Warning
1910.1200 (g) Material Safety Data Sheets (MSDS)
1910.1200 (h) Employee Information and Training
1910.1200 (i) Trade Secrets
1910.1200 (j) Effective Dates
1910.1030 Bloodborne Pathogen Training
1910.95 Hearing Conservation

The requirements under the Federal Right To Know Standard have been thoroughly covered as they pertain to my work place. I am aware that MSDS documentation is available to me for review and I know whom to contact with any additional questions that I may have regarding these issues.

NAME

MAREK KUCOWSKI

Christian Antoszczak

Orla Barlog

~~Robert Kucowski~~

✓ Baruch Dager

✓ LAVAN THERLONGE

Rufus Hutchinsons Jr

JOHN ROKICKI

SIGNATURE

Marek Kucowski

Christian Antoszczak

ORLA BARLOG

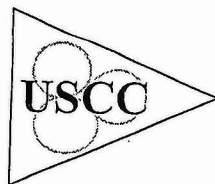
~~Robert Kucowski~~

B. Dager

Lorance Therlonge

Rufus Hutchinsons Jr

John Rokicki



RESPIRATOR TRAINING

COMPANY: Flon Chemical

INSTRUCTOR: Tatiana Melander

DATE: 05/12/05

I have been present at this Respiratory Protection training session and understand the material as contained in Section 1910.134, Title 29 of the Code of Federal Regulations and issues that have been presented. I also understand the role which I am to perform in the event of an emergency. I have had the opportunity to ask questions and have them answered to my satisfaction.

NAME

FRANK WAGENHOFFER

ROBERTO ROBINSON

LAVAU THERLONGE

Alberto Robinson

JOE DAVIS

CEFERINO MANLAPAZ

Frank Crespo

Henry Piccoli

Hassan Rouse

Garry DelPino

Jersey Turovich

STEVEN JETT

Baruch Dagan

JOHN ROKICKI

SIGNATURE

Frank J. Wagenhoffer

Roberto Robinson

Lavaud Therlonge

Alberto Robinson

Joe Davis

Ceferino Manlapaz

Frank Crespo OPERATOR

Henry Piccoli MECHANIC

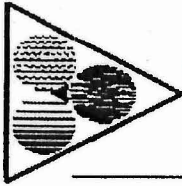
Hassan Rouse MECHANIC

Garry DelPino FOREMAN

Jersey Turovich MECHANIC

Steve Jett MECHANIC

Baruch Dagan ELECTRICIAN
John Rokicki MAINTENANCE SUPERVISOR



CONTROL OF HAZARDOUS ENERGY (LOCKOUT/TAGOUT)

COMPANY: Flan Chemical
Awareness

DATE: 11/29/05

INSTRUCTOR: Tatiana Holinder

I have been trained in the use and application of the Hazardous Energy Lockout Tagout Program as contained in Section 1910.147, Title 29 of the Code of Federal Regulations and the company's written program, as it relates to the work I am performing.

NAME

MAREK WIECINSKI

KRYSTIAN ANTOSZCZAK

JAMES ROUSE

IRA BARBER

ROBERTO JOHNSON

LAVAU THELONGE

Baruch Dagon

Rufus Hutchinson

SIGNATURE

[Signature]

[Signature]

[Signature]

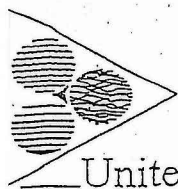
[Signature]

[Signature]

[Signature]

[Signature]

[Signature]



United States Compliance

Employee Safety Training Record

Company: _____ Subject: Confined Space (Awareness)

Description of Subject Material: _____

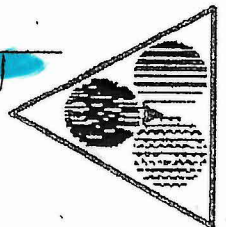
Trainer's Signature: Tatiana Motenop Date: 11/29/05

Employee Print Name:
(Nombre y Apellido por favor con letra de molde)

Signature:
(Firma)

MARREK KUECHUNSHU
KRISTIAN ANTOSZCZAK
✓ James Rouse
IRA BARBER
ROBERTO RODRIGUEZ
✓ JORDAN THERLONGE
Baruch Dager
Calvin Daniel
Rutvik Hotchima
✓ Garrymang Villanueva
Henry Rodriguez
Eddie Kearney Sr
JERZ TURBON
STEVEN McQUEEN

MA
Motenop
James Rouse
Ira Barber
Robert Rodriguez
Jordan Therlonge
B. Dager
Calvin Daniel
Rutvik Hotchima
Garrymang Villanueva
Henry Rodriguez
Eddie Kearney Sr
Jerz Turbon
Steven McQueen



FOCUS IT OPERATOR TRAINING

COMPANY: EAU CHEMICAL

DATE: 17 JUN 04

INSTRUCTOR: O. Youssef

NAME

STEVEN M'QUEEN

HASSAN FOUSE

HENRY MARSHIP

BERNARD B. RICKS

COLASO CLAYTON

LAVANUO THERLANCE

STEVEN SETT

ED BARS

11 boat Billy Summers

SIGNATURE

Middle

Warehouse

Maint

Summer Temp

Prod

Maint

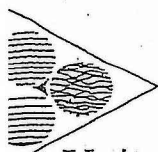
Prod

Donnered Therlance

Alt. Pelt Maintenance

Prod

Warehouse



United States Compliance

Employee Safety Training Record

Company: _____ Subject: Bloodborne Pathogen (Awareness)

Description of Subject Material: Training in accordance
with standard 1910.1030

Trainer's Signature: Esthela Melendez Date: 11/29/05

Employee Print Name:

(Nombre y Apellido porfavor con letra de molde)

Signature:

(Firma)

MARLEN KUEHNEN

KRYSTIAN ANTOSZCZAK

IRA BARBER

ROBERTO - FO PUESA

LAVAND THERLONG

SAM S. KOSCH

Baruch bagin

Roger Hutchinson Jr

Calvin Daniel

GOMMARD DELPIANO

Henry Gissner

Eddie Kearney Jr

SEBASTIAN TURZADIS

STEVEN McJUREN

M. Antoszk

Don Barber

Robert F. Poesa

Lavand Therlong

Sam S. Kosch

B. Bagin

R. Hutchinson Jr

Calvin Daniel

Gommard Delpiano

Henry Gissner

Eddie Kearney Jr

Sebastian Turzadis

Steven McJuren

GMP/Food Safety Training for New and Current Employees

Outlined below is a Good Manufacturing Practices/Product Safety Program that you are expected to adhere and follow.

Hairnets and beardnets must be worn in the processing areas.

All personal items (coats, purses, etc.) must be kept away from the production equipment and processing and storage areas.

Clean clothing must be worn by all personnel.

No jewelry of any kind is permitted in the plant (except for plain wedding bands).

Practice good personal hygiene.

Always wash your hands after every visit to the restrooms, after breaks and lunch, whenever your hands become soiled, etc.

All containers should be labeled as to what the contents are and it should be a single item container.

No eating, drinking, or use of tobacco products allowed in the production area. Chewing gum/candy, etc. is not permitted in the plant.

I have read and understood the above program.

Signed: Lorand Theberge

Date: 11/07/05

Morris County Fire Fighters and Police Training Academy



Certificate of Completion

This Is To Certify That

Ben Armenti

Has Successfully Completed

Fire Fighter 1

Under Sponsorship Of The Morris County Board of Chosen Freeholders

Date June 10, 2002 - July 24, 2002


Robert M. O'Connor
Academy Administrator

Honeywell

CERTIFICATE OF ACHIEVEMENT

BEN ARMENTI

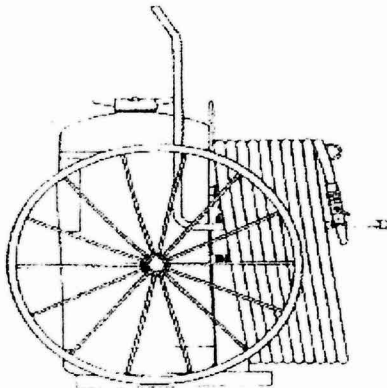
FOR THE SUCCESSFUL COMPLETION OF

FIRE FIGHTER I

EXTINGUISHER TRAINING

July 15, 2002

Conducted at the Morris County Fire & Police Academy



Joseph M. Schwed

Joseph M. Schwed, CSP, Site Health, Safety & Environment Leader

Frank T. Rodimer

Frank T. Rodimer, Coordinator - Fire Fighter Training

Scheduled Upon Request. This course is 6 hours.

This course will discuss the rights and responsibilities of the driver. Also discussed will be the officer / passengers responsibilities of apparatus crashes the student will gain a better emergency vehicle driving under emergency conditions.

Class size: Minimum 20 students - Maximum 30 students

Top of Page



FIRE FIGHTER 1

- February 15 - June 19 (0601)
Mon/Wed/Fri - Orientation February 1
- March 7 - June 10 (0602)
Tues/Sat - Orientation February 21
- June 22 - July 18 (Daytime) (0603)
Monday - Friday - Orientation June 22
- September 6 - December 13 (0604)
Wed/Sat - Orientation August 23

Fire Fighter 1 is the first level of a progressive program with Fire Fighter 1, 2, and 3. This level introduces the novice firefighter to nationally recognized fire fighting techniques. Methods of instruction include classroom theory as well as skill oriented "hands on" drills. Student performance will be evaluated throughout the course including exams, both written and practical. The New Jersey Division of Fire standardized Fire Fighter 1 test is given as part of the final exam. The course meets the performance objectives of the N.F.P.A. standard 5:73 4.3 standard which will allow a firefighter to perform direct supervision. All students will receive ICS Orientation, Pathogens, Right to Know and Hazardous Materials Awareness Levels of training as required by N.J.A.C. 5:75-6.1. Full Personal Protective Equipment is required for **all** sessions. **Class size: Minimum 20 students - Maximum 30 students**

This course is approved for college credits by the County Council on Postsecondary Education

This course's dress code requires a shirt - [click here for or](#)

Top of Page

FIRE FIGHTER 2

- April 3 - July 5 (0621)
Mon/Wed
- July 17 - July 27 (Daytime) (0622)
Monday - Thursday
- September 5 - December 7 (0623)
Tues/Thurs

Fire Fighter 2 is the second level of a progression which includes Fire Fighter 1, 2, and 3. Instruction at this level will be aimed at providing the student with the skills and knowledge necessary to function under general supervision.

Safety Associates Training Network

Be it known that

Ben Armenti

has successfully completed

8 hour HAZWOPWER Refresher

meeting the requirements of

29 CFR 1910.120(e)

BILLY DONNERSTAG

Instructor, FF, EMT, Haz Mat Specialist

June 4, 2005.

Date

RESPONSE TO ALLEGED NOV_s
& IRLs

ATTACHMENT 5

Training Records for
Mr. Lavaud Therlonge
Waste Handler/Mechanical Helper

Elan Chemical Company, Inc.
Newark, NJ

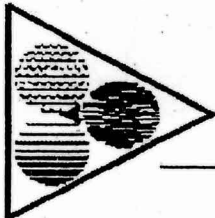
JW Rufolo's Institute for Occupational Safety and Health

The Faculty
in recognition of successful completion of
the program of study required by
OSHA 29 CFR 1910.120(e)(2)
hereby confer upon
Lavaud Therlonge
the Certification of
40 Hour Hazardous Waste Site Worker
Given at Edison in the State of New Jersey.

For the Faculty
Joseph W Rufolo
Joseph W Rufolo
President & CEO



On this 31st
day of
July, 1997



RIGHT TO KNOW TRAINING

COMPANY: Elan Chemical

DATE: 11/29/05

INSTRUCTOR: Tatiana Melendez

1910.1200 (a) Purpose
1910.1200 (b) Scope
1910.1200 (c) Definitions
1910.1200 (d) Hazardous Determination
1910.1200 (e) Written Hazardous
Communication Program
1910.157 Fire Extinguisher Training

1910.1200 (f) Labels and Other Forms of Warning
1910.1200 (g) Material Safety Data Sheets (MSDS)
1910.1200 (h) Employee Information and Training
1910.1200 (i) Trade Secrets
1910.1200 (j) Effective Dates
1910.1030 Bloodborne Pathogen Training
1910.95 Hearing Conservation

The requirements under the Federal Right To Know Standard have been thoroughly covered as they pertain to my work place. I am aware that MSDS documentation is available to me for review and I know whom to contact with any additional questions that I may have regarding these issues.

NAME

MAREK KUCOWSKI

Christian Antoszczak

Ora Barba

~~Robert Kucowski~~

✓ Baruch Dager

✓ LAVAN THERLONGE

Rufus Hutchinson Jr

JOHN ROKICKI

SIGNATURE

Marek Kucowski

Christian Antoszczak

ORA BARBA

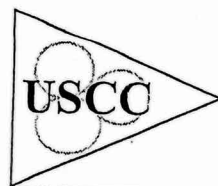
~~Robert Kucowski~~

B. Dager

Lavand Therlonge

Rufus Hutchinson Jr

John Rokicki



RESPIRATOR TRAINING

COMPANY: Flon Chemical

INSTRUCTOR: Tatiana Melender

DATE: 05/12/05

I have been present at this Respiratory Protection training session and understand the material as contained in Section 1910.134, Title 29 of the Code of Federal Regulations and issues that have been presented. I also understand the role which I am to perform in the event of an emergency. I have had the opportunity to ask questions and have them answered to my satisfaction.

NAME

FRANK WAGENHOFFER

ROBERTO ROBINSON

LAVAU THERLONGE

Alberto Robinson

JOE DAVIS

CEFERINO MANLAPAZ

Frank Crespo

Henry Piccoli

Hassan Kouse

Garry Dellano

Jersey Tancouche

STEVEN JETT

Baruch Dagan

JOHN KORICKI

SIGNATURE

Frank J. Wagenhoffer

Roberto Robinson

Lavaud Therlonge

Alberto Robinson

Joe Davis

Ceferino Manlapaz

Frank Crespo OPERATOR

Henry Piccoli MECHANIC

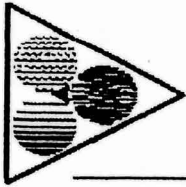
Hassan Kouse MECHANIC

Garry Dellano FORMER

Jersey Tancouche MECHANIC

Steven Jett MECHANIC

Baruch Dagan ELECTRICIAN
John Koricki MAINTENANCE SUPERVISOR



CONTROL OF HAZARDOUS ENERGY (LOCKOUT/TAGOUT)

COMPANY: Flan Chemical
Auxiliaries

DATE: 11/29/05

INSTRUCTOR: Tatiana Holmbeck

I have been trained in the use and application of the Hazardous Energy Lockout Tagout Program as contained in Section 1910.147, Title 29 of the Code of Federal Regulations and the company's written program, as it relates to the work I am performing.

NAME

MAREK KUCIUNSKI

SIGNATURE

[Signature]

KRYSTIAN ANTOSZCZAK

[Signature]

James Rouse

[Signature]

IRA BARBER

[Signature]

Roberto Tabone

[Signature]

LAVARD THERLONGE

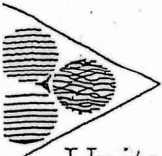
[Signature]

Baruch Dagon

[Signature]

Rufus Hutchinson

[Signature]



United States Compliance

Employee Safety Training Record

Company: _____ Subject: Confined Space (Awareness)

Description of Subject Material: _____

Trainer's Signature: Tatiana Melendez Date: 11/29/05

Employee Print Name:

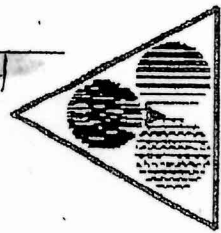
(Nombre y Apellido por favor con letra de molde)

Signature:

(Firma)

MARCEL KECUMUNSI
KRYSTIAN ANTOSZAK
✓ James Rouse
IRA BARBER
ROBERTO ROBLES
✓ Howard THERLON
Baruch Daga
Calvin Daniel
Rutvik Hatcherina
✓ Guillermo Villarreal
Henry Rios
Eddie Kearney Sr
JEFF TURBON
STEVEN McQUEEN

Mr. Melendez
James Rouse
Ira Barber
Robert Robles
Howard Therlon
B. Daga
Calvin Daniel
Rutvik Hatcherina
Guillermo Villarreal
Henry Rios
Eddie Kearney Sr
Jeff Turbon
Steve McQueen



FOREST OPERATOR TRAINING

COMPANY: EAU CHEMICAL

DATE: 17 JUN 04

INSTRUCTOR: C. YOUSSEF

NAME

STEVEN M'QUEEN

HASSAN FOUSE

HENG MANSHIP

BERNARD B. RICKS

COLASO CAYLLO

LAVANUO THERLOMGE

STEVEN SETI

ED BARS

IBENT BILLY SUMMERS

SIGNATURE

Steve midair

- Warehouse

- Maint

- Summer Temp

- Rod

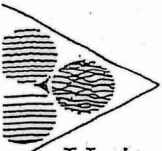
- Maint

- Rod

Alt Belt maintenance

- Rod

Warehouse



United States Compliance

Employee Safety Training Record

Company: _____ Subject: Bloodborne Pathogen (Awareness)

Description of Subject Material: Training in accordance
with standard 1910.1030

Trainer's Signature: Esthela Melendez Date: 11/29/05

Employee Print Name:

(Nombre y Apellido por favor con letra de molde)

Signature:

(Firma)

MARLEN MUELLING
KRISTIAN ANTO SZCZAK
IRA BARBER
ROBERTO - FO DUESES
LAVARD THERLONG
Sam S. Koush
Baruch Bagan
Ruth H. H. H. H. H.
Calvin Daniel
GOMMARD DELPIANO
Henry Gissner
Eddie Kearney Jr
SE 24 TURZADIS
STEVEN McJUREN

Antoszczak
Don Barber
Robert F. Dueses
Lavard Therlong
Sam S. Koush
B. Bagan
Ruth H. H. H. H.
Calvin Daniel
Gommar Delpiano
Henry Gissner
Eddie Kearney Jr
Steven McJuren

GMP/Food Safety Training for New and Current Employees

Outlined below is a Good Manufacturing Practices/Product Safety Program that you are expected to adhere and follow.

Hairnets and beardnets must be worn in the processing areas.

All personal items (coats, purses, etc.) must be kept away from the production equipment and processing and storage areas.

Clean clothing must be worn by all personnel.

No jewelry of any kind is permitted in the plant (except for plain wedding bands).

Practice good personal hygiene.

Always wash your hands after every visit to the restrooms, after breaks and lunch, whenever your hands become soiled, etc.

All containers should be labeled as to what the contents are and it should be a single item container.

No eating, drinking, or use of tobacco products allowed in the production area. Chewing gum/candy, etc. is not permitted in the plant.

I have read and understood the above program.

Signed: Lorand Theberge Date: 11/07/05

Morris County Fire Fighters and Police Training Academy



Certificate of Completion

This Is To Certify That

Ben Armenti

Has Successfully Completed

Fire Fighter 1

Under Sponsorship Of The Morris County Board of Chosen Freeholders

Date June 10, 2002 - July 24, 2002


Robert M. O'Connor
Academy Administrator

Honeywell

CERTIFICATE OF ACHIEVEMENT

BEN ARMENTI

FOR THE SUCCESSFUL COMPLETION OF

FIRE FIGHTER I

EXTINGUISHER TRAINING

July 15, 2002

Conducted at the Morris County Fire & Police Academy



Joseph M. Schwed

Joseph M. Schwed, CSP, Site Health, Safety & Environment Leader

Frank T. Rodimer

Frank T. Rodimer, Coordinator - Fire Fighter Training

Scheduled Upon Request. This course is 6 hours.

This course will discuss the rights and responsibilities of the driver. Also discussed will be the officer / passengers responsibilities of apparatus crashes the student will gain a better emergency vehicle driving under emergency conditions.

Class size: Minimum 20 students - Maximum 30 students



FIRE FIGHTER 1

- February 15 - June 19 (0601)
Mon/Wed/Fri - Orientation February 1
- March 7 - June 10 (0602)
Tues/Sat - Orientation February 21
- June 22 - July 18 (Daytime) (0603)
Monday - Friday - Orientation June 22
- September 6 - December 13 (0604)
Wed/Sat - Orientation August 23

Fire Fighter 1 is the first level of a progressive program with Fire Fighter 1, 2, and 3. This level introduces the novice firefighter to nationally recognized fire fighting techniques. Methods of instruction include classroom theory as well as skill oriented "hands on" drills. Student performance will be evaluated throughout the course including exams, both written and practical. The New Jersey Division of Fire standardized Fire Fighter 1 test is given as part of the final exam. This course meets the performance objectives of the N.F.P.A. standard 5:73 4.3 standard which will allow a firefighter to perform direct supervision. All students will receive ICS Orientation, Pathogens, Right to Know and Hazardous Materials Awareness. Levels of training as required by N.J.A.C. 5:75-6.1. Full Personal Protective Equipment is required for all sessions. **Class size: Minimum 20 students - Maximum 30 students**

This course is approved for college credits by the County College of Morris.

This course's dress code requires a shirt - [click here for or](#)

FIRE FIGHTER 2

- April 3 - July 5 (0621)
Mon/Wed
- July 17 - July 27 (Daytime) (0622)
Monday - Thursday
- September 5 - December 7 (0623)
Tues/Thurs

Fire Fighter 2 is the second level of a progression which includes Fire Fighter 1, 2, and 3. Instruction at this level will be aimed at providing the student with the skills and knowledge necessary to function under general supervision.

Safety Associates Training Network

Be it known that

Ben Armenti

has successfully completed

8 hour HAZWOPWER Refresher

meeting the requirements of

29 CFR 1910.120(e)

BILLY DONNERSTAG

Instructor, FF, EMT, Haz Mat Specialist

June 4, 2005.

Date

RESPONSE TO ALLEGED NOV_s
& IRL_s

ATTACHMENT 6

Agreements for Emergency Response Services
from:

City of Newark Fire Department
HMHTTC

S&D Environmental Services, Inc.

Elan Chemical Company, Inc.
Newark, NJ

Newark

Sharpe James
Mayor

Fire Department
Administration

1010 - 18th Avenue
Newark, New Jersey 07106
973-733-7424

Lowell F. Jones
Director

November 14, 2005

Jocelyn K. Manship
Elan Chemical Company, Inc.
268 Doremus Avenue
Newark, NJ 07105

Dear Mrs. Manship

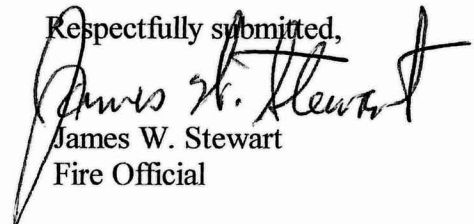
The Newark Fire Department will respond to any and all fire related emergencies or Hazardous Material incidences at Elan Chemical Company, Inc. located at 268 Doremus Avenue, Newark, New Jersey.

This letter serves as an agreement between Elan Chemical Company, Inc. and the Newark Fire Department that upon request or notification, the Newark Fire Department will respond and take appropriate action.

Our activities will be coordinated through Mr. Michael Almaguer, Hazardous Materials Inspector of the Newark Fire Department.

If you need additional information, please contact me.

Respectfully submitted,



James W. Stewart
Fire Official

**CITY OF NEWARK
FIRE DEPARTMENT
HAZARDOUS MATERIALS FACILITY PERMIT**



FACILITY NAME: ELAN CHEMICAL CORPORATION

FACILITY ADDRESS: 268 DOREMUS AVENUE

NEWARK, NEW JERSEY 07105

PERMIT NO.: HMFP106C

SIC CODE: 2899 & 2868

CERTIFICATE OF OCCUPANCY NO.:

DATE OF ISSUANCE: APRIL 6, 2005

DATE OF EXPIRATION: APRIL 6, 2010

ISSUED BY: Lowell F. Jones

LOWELL F. JONES, FIRE DIRECTOR

NOTE: No person, firm or corporation shall cause, suffer or permit the transportation, storage and use of hazardous materials in a manner which violates any provision of Ordinance 6PHS&FV062487; Hazardous Materials Regulations or any other local, state or federal statute, code, rule or regulation relating to hazardous materials, or in a manner which causes a discharge of hazardous materials or poses a significant risk of such a discharge.



ENVIRONMENTAL SERVICES, INC.

Corporate Office
11 Elkins Road
East Brunswick, NJ 08816
Phone: 732-432-5566
Fax: 732-432-5757
www.sdenvironmental.com

October 12, 2000

Elan Chemical Inc.
268 Doremus Ave.
Newark, NJ 07105

Attention: Jocelyn Manship

EMERGENCY RESPONSE AGREEMENT

S&D Environmental Services, Inc., will respond as necessary as your Emergency Response Contractor in the event of a hazardous material or petroleum spill.

We will mobilize and supply the necessary supervision, manpower and equipment to contain and clean up any spill that may occur. These services will be provided in accordance with the rates, terms and conditions of our spill rate sheets, which are enclosed.

S&D is a chemical, oil, and industrial waste management firm with experience in all aspects of environmental contracting; including emergency response, industrial cleaning, site remediation, transportation, and disposal. S&D has the technical expertise, equipment, manpower, and facilities required to successfully meet your project needs.

S&D is presently the primary emergency services contractor for the NJDEP under the contract X-30946. S&D has held this position for over 9 of the last 12 years. In addition, S&D has US Coast Guard, OSRO Classifications in the following ports: New York, Philadelphia, Long Island Sound, Boston, Providence, Baltimore and Hampton Roads. S&D also has several licensed Captains on staff for large vessel operation. S&D currently maintains staffing of eight (8) Supervisors and fifty field personnel who are OSHA trained and equipment qualified.

We have attached a generic work authorization that can be signed and returned with your executed Emergency Response Agreement. This will minimize response time to your incident. By signing this agreement and the attached work authorization, it in no way obligates your firm to utilize S&D for the above services, however, it will expedite our services in a timely and effective manner when and if our services are needed by your company.

Thank you for considering S&D as your Emergency Response Contractor. Please sign and returned this letter along with the attached Customer Work Authorization at your earliest convenience. Any modifications will be forwarded to you when applicable.

Sincerely,

Edward Golub
Marketing Representative

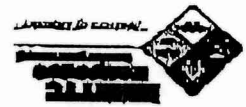
Elan Chemical Inc., agrees to name S&D Environmental Services, Inc., as our Emergency Response Contractor on an as needed basis.

SIGNED:

DATE: 11/29/00

TITLE: ENVIRONMENTAL MANAGER

PHONE: 973 344 8014



Hazardous Materials Emergency Response Agreement

Date: May 31, 2006

Customer:
Elon Chemical Company, Inc.
(legal name)
268 Doremus Avenue
Newark, NJ 07105
(address)

(legal entity and state)
HMHTTC Response, Inc.
400 Valley Rd., Suite 303
Mt. Arlington, NJ 07856
New Jersey corporation

Customer and HMHTTC agree as follows:

1. Services. During the term of this Agreement, Customer may contact HMHTTC in the event that it requires the following services: emergency response or similar environmental or remediation services, response related consulting work and similar services ("Emergency Response Services"). HMHTTC will respond to Customer's request by: (a) providing Emergency Response Services to Customer ("Direct Services"); or (b) in the event that HMHTTC is unable to provide Direct Services, securing a contractor to provide the Emergency Response Services to Customer ("Dispatch Services"). HMHTTC will devote the necessary time and effort to complete the Services it agrees to perform in compliance with any due dates or time of performance agreed upon. HMHTTC warrants that the Services will be in compliance with generally accepted standards for people doing similar work and in compliance with applicable laws, regulations and ordinances. In the event of any failure to comply with the above standards, Customer's sole remedy shall be for HMHTTC to correct such Service upon notice thereof from Customer. Unless specifically agreed upon by the Parties in writing, the Services shall not include any required notification of or coordination with governmental authorities or securing non-HMHTTC personnel from the work location ("Work Zone Security") which activities shall be performed by Customer.

Customer acknowledges that Customer is the sole generator of any hazardous or toxic substance, pollutant or contaminants pursuant to federal, state or local law ("Waste"); present at the work location; HMHTTC has no role in generating, treating, storing or disposing of the Waste; Customer shall evaluate and select the proper disposal site for treatment and disposal of the Waste and shall be solely responsible therefore; and any action taken by HMHTTC regarding the Waste shall be deemed as an agent of and for the exclusive benefit of the Customer, including signing any necessary documentation on behalf of the Customer regarding the Waste. Customer waives any and all claims against HMHTTC for Services provided regarding Waste other than that which is caused by HMHTTC's sole negligence or willful misconduct.

Nothing in this Agreement will require Customer to provide work to HMHTTC.

2. Cost of Services and Payments. Customer shall pay the following per each request for Services: (a) Direct Services will be performed on a time, materials and cost plus basis in accordance with HMHTTC's rate schedule in effect at the time the Services are rendered ("Rate Schedule"); (b) Dispatch Services will be performed with charges invoiced by the contractor, less sales tax, plus 15% of the adjusted invoice amount; and (c) Additional Services as otherwise agreed to by the Parties in writing. Any estimate of the cost of the Services by HMHTTC shall be for informational purposes only and will not be binding on HMHTTC. Customer acknowledges acceptance and receipt of the Rate Schedule. Payment for the Services is due thirty (30) days from the date of HMHTTC's invoice unless otherwise agreed by the Parties. Payment of the invoice will be made in the US currency. Customer will pay a late fee of one and one half percent (1.5%) per month on any outstanding balance owed or the maximum amount permitted by applicable law. HMHTTC will be entitled to attorneys fees and costs in the event of the enforcement of this Agreement. HMHTTC reserves the right to require a deposit, prepayment, periodic payments or cease performance of the Services at any time if HMHTTC determines in its sole

05/30/2005 11:37

9737706901

HMHTTC DISPATCH

judgment that the Customer may be unable to make a timely payment and Customer authorizes HMHTTC to charge its credit card, if any, for any required deposit or payment for Services rendered.

3. **Term.** The term of this Agreement shall be for two years and shall automatically renew for successive one year terms unless terminated by either party on thirty days notice prior to the expiration of the term. Notwithstanding the foregoing, this Agreement may be terminated by either party on twenty (20) days prior notice in the event of a breach of this Agreement and failure to cure within the notice period.

4. **Confidentiality.** Each Party acknowledges that all non-public information, disclosed as a result of this Agreement ("Information") shall be deemed to be confidential and proprietary. Each Party agrees not to disclose or use the Information except in connection with this Agreement or as required by law to do so. Each Party agrees to promptly notify the other of any court order or subpoena compelling disclosure of the Information.

5. **DISCLAIMERS AND LIMITATION OF LIABILITY.** HMHTTC MAKES NO WARRANTY OF ANY KIND WITH REGARD TO THE SERVICES AND THE MATERIALS PROVIDED, EXCEPT AS OTHERWISE PROVIDED IN THESE TERMS AND CONDITIONS. HMHTTC DISCLAIMS ALL REPRESENTATIONS AND WARRANTIES, EXPRESS OR IMPLIED AS TO THE MATERIALS PROVIDED INCLUDING WITHOUT LIMITATION, ANY IMPLIED WARRANTY OF MERCHANTABILITY, NONINFRINGEMENT OR FITNESS FOR A PARTICULAR PURPOSE. IN NO EVENT WILL HMHTTC BE LIABLE FOR ANY LOSS, DAMAGE OR COST FOR BREACH OF WARRANTY.

HMHTTC WILL NOT, IN ANY EVENT, BE LIABLE FOR ANY LOSS OF REVENUE, PROFIT, USE OF DATA, INTERRUPTION OF BUSINESS OR FOR SPECIAL, INDIRECT, CONSEQUENTIAL, INCIDENTAL, EXEMPLARY OR PUNITIVE DAMAGES HOWEVER CAUSED AND REGARDLESS OF THE THEORY OF LIABILITY, ARISING OUT OF THE SERVICES, MATERIALS OR IN ANY WAY CONNECTED TO THIS AGREEMENT, EVEN IF HMHTTC HAS BEEN ADVISED OF SUCH DAMAGES. IN NO EVENT WILL HMHTTC'S LIABILITY TO CUSTOMER EXCEED THE PRICE PAID TO HMHTTC BY CUSTOMER FOR THE SERVICES. THIS DISCLAIMER AND LIMITATION OF LIABILITY PROVISION WILL APPLY WHETHER ANY CLAIM IS BASED UPON PRINCIPLES OF CONTRACT, WARRANTY, NEGLIGENCE OR OTHER TORT, BREACH OF STATUTORY DUTY, PRINCIPLES OF INDEMNITY OR CONTRIBUTION OF OTHERWISE.

6. **Indemnification.** HMHTTC shall indemnify, defend and hold Customer, its directors, officers, employees, contractors and agents harmless from all claims, demands, causes of action, loss and liability, including attorneys fees and costs, arising from HMHTTC's negligence or willful misconduct in performing the Services, other than Services regarding the waste in which case HMHTTC indemnification shall be limited to its sole negligence or willful misconduct, or HMHTTC's breach of this Agreement.

Customer shall indemnify, defend and hold HMHTTC, its directors, officers, employees, contractors and agents harmless from all claims, demands, causes of action, loss and liability, including attorneys fees and costs, arising from Customer's negligence or willful misconduct, Customer's breach of this Agreement, Customer's contractor's negligence or willful misconduct where applicable or any handling, transportation, release, generation, treatment, storage or disposal of the Waste, other than that which arises from HMHTTC's sole negligence or willful misconduct.

7. **Choice of Law and Venue.** This Agreement will be construed in accordance with the laws of the State of New Jersey, other than principles of conflicts of law. Customer consents to the non-exclusive jurisdiction of the State and Federal Courts in Morris County, New Jersey and to service of process via regular mail.

8. **Waiver.** The failure of either Party to the strict performance of any of the provisions of this Agreement will not be deemed a waiver of any breach or default.

9. **Authority.** Each of the Parties represents that it has the authority to enter into and sign this Agreement.

10. **Notice.** Any notice given to either Party will be in writing and effective upon transmission

via facsimile, within two days of depositing same with a national overnight carrier or within three days of depositing same at the post office.

11. Severability. If any provision of this Agreement is unenforceable as a matter of law, all other provisions will remain in effect.

12. Assignment. Customer may not assign this Agreement without HMHTTC's prior, written consent. HMHTTC may assign this Agreement.

13. Force Majeure. HMHTTC will not be liable for any failure in performance whatsoever due to acts of God, earthquakes, shortage of supplies, transportation difficulties, labor disputes, riots, war, fire, epidemics, terrorist activities or responses thereto and similar occurrences.

14. Entire Agreement. This Agreement constitutes the entire agreement between the parties regarding the subject matter thereof and supersedes all prior or current written or oral agreements and understandings. This Agreement may only be modified or amended in writing signed by both Parties.

Customer

HMHTTC

By: Mary Guenera
Title: Dir. of QA & Regulatory Affairs
Date: 7/13/06

By: [Signature]
Title: Dir. of Corp. Development
Date: 7-13-06



HMHTTC RESPONSE, INC. **RATE SCHEDULE** **TIME, MATERIAL & COST PLUS RATES**

CODE	LABOR CATEGORY	\$ RATE
(EC)	Emergency Response Haz-Mat Coordinator, (Supervisor)	65.00/Hour
(ER)	Emergency Response Technician	44.00/Hour
(EL)	Emergency Response Team Leader, (Foreman)	54.00/Hour
(ES)	Senior Haz-Mat Coordinator (Project Manager)	85.00/Hour
(NR)	National Response Manager	92.00/Hour
(EO)	Equipment Operator, Driver	43.00/Hour
(GL)	General Laborer	39.00/Hour
(GT)	General Technician	41.00/Hour
(SC)	Cargo Tank Truck Specialist Coordinator (1 count, maximum)	80.00/Hour
(ST)	Cargo Tank Truck Specialist Technician (2 count, maximum)	60.00/Hour
(RT)	Tank Car Specialist	55.00/Hour
(RS)	Railroad Response Manager	80.00/Hour
(PM)	Product Transfer Manager	70.00/Hour
(PO)	Principle/Officer	120.00/Hour
(DS)	Director of Security & Internal Investigations	92.00/Hour
(DC)	Bloodborne Response Coordinator	54.00/Hour
(BT)	Bloodborne Response Technician	37.00/Hour
(BL)	Bloodborne Response Team Leader	41.00/Hour
(DC)	Disposal Coordinator	75.00/Hour
(HS)	Health and Safety Officer	85.00/Hour
(LG)	Logistics Specialist	60.00/Hour
(EE)	Environmental Engineer/Scientist	60.00/Hour
(CH)	Chemist	60.00/Hour
(TR)	Reactive/Shock Sensitive Technician	90.00/Hour
(SR)	Reactive/Shock Sensitive Supervisor	98.00/Hour
(TC)	Highway Traffic Controller, Flag person	32.00/Hour
(SO)	Security Officer	37.00/Hour
(ZS)	Work Zone Security Worker	45.00/Hour
(ME)	Mechanic	40.00/Hour
(DD)	Dive Team Coordinator	88.00/Hour
(DL)	Dive Team Leader	77.00/Hour
(DT)	Dive Team Tender	52.00/Hour
(DV)	Diver	67.00/Hour
(FC)	Field Clerk	33.00/Hour
(AA)	Administrative Assistant	36.00/Hour
(AU)	TPA Auditor	65.00/Hour
(PD)	Per Diem	125.00/Day
(HC)	Head Cook	34.00/Hour
(PC)	Prep Cook	32.00/Hour

Note: All dive applications will be charged premium pay for any dives greater than 40' in depth. Premium pays are site specific, and start out at a 10% surcharge of the hourly rates for each 10 ft (in depth) increments required to work.

CODE	PERSONAL PROTECTIVE EQUIPMENT	\$ RATE
(LA)	Level "A" (Fully Encapsulated with SCBA)	575.00/Day
(LS)	Level "A" (Standby only, no actual entry necessary)	200.00/Day
(LB)	Level "B" (Chemical Protective Clothing with SCBA)	435.00/Day
(LN)	Level "B" (Standby only, no actual entry necessary)	175.00/Day
(LC)	Level "C" (Chemical Protective Clothing with APR)	95.00/Day
(BP)	Bloodborne Protection	75.00/Day
(SA)	Scuba Application, Dive Gear	350.00/Day
(FF)	Structural Fire Fighting Gear (Thermal Protection with SCBA)	450.00/Day
(PS)	Proximity Flash Suits (Thermal Protection with SCBA)	650.00/Day
(NS)	Nomex Jump Suits (Thermal Protection)	55.00/Day
(SX)	Disposable Chemical Oversuit	46.00/Each

The previous charges are for a maximum of one bottle of air, one canister, one disposable chemical suit, and one pair of chemical protective gloves. Breathing apparatuses are included in all above charges. Replacement, restoration or additional items for above are:

(R01)	Mobile Cascade System, Air Bottle Refill (SCBA/SCUBA)	200.00/Day
(R02)	Air Bottle Refill (In-line Air System)	32.00/Bottle
(R03)	Level "C" Respirator Cartridge, Replacement	12.00/Each
(R04)	Level "A" Suit, Replacement	Cost + 20%
(R05)	Chemical Resistant Suit, Replacement	Cost + 20%
(R06)	Bloodborne Resistant Suit, Replacement	34.00/Each
(R07)	Viton Chemical Gloves, Replacement	52.00/Pair
(R08)	Nitrile Chemical Gloves, Replacement	4.00/Pair
(R09)	Butyl Chemical Gloves, Replacement	22.50/Pair
(R10)	Haz-Mat Chemical Boots, Replacement	80.00/Pair
(R11)	Fire Walker, Rangers, Replacement	145.00/Pair
(R12)	Chest Waders, Replacement	142.00/Each
(R13)	Hard Hat, Replacement	26.50/Each
(R14)	Wet/Dry Dive Suits, Replacement	Cost + 20%
(R15)	Cooling Vests, Replacement	Cost + 20%
(R16)	Cooling Vest	55.00/Day
(R17)	PVC Chest Waders	35.00/Day
(R18)	PVC Chest Waders, Replacement	145.00/Each
(R19)	PVC Chemical Gloves, Replacement	9.00/Pair
(R20)	Chemical Resistant Overboots (Chicken Boots)	14.00/Pair
(R21)	Silvershield Gloves	25.50/Pair

CODE	VEHICLES & HEAVY EQUIPMENT	\$ RATE
(100)	Emergency Response, First Line Vehicle	60.00/Hour
(200)	Emergency Response Van	35.00/Hour
(300)	Standard Pick-Up Truck	125.00/Day
(400)	Technical Mobile Command Unit, (major incidents)	400.00/Day
(500)	Emergency Response Box Truck with Lift Gate	45.00/Hour
(500A)	Standard Box Truck with Lift Gate	250.00/Day
(600)	Emergency Response Roll-Up Haz-Mat Unit, (major incidents)	400.00/Day
(600A)	Hydro Pressure Washer, 4000 psi	95.00/Hour
(800)	Special Operations and Spill Response Trailers	185.00/Day
(800A)	45'-48' Major Disaster Response Trailer, (major incidents)	3,500.00/Day
(800A1)	45'-48' MDRT Mobilization/Demobilization (in addition to fuel surcharge)	3.00/Mile
(800B)	Special Operations Transfer Trailer	500.00/Day
(800C)	Mobil Canteen-Disaster Support Unit (Food will be charged at cost +20%)	1500.00/Day
(800C1)	48' MCDS Mobilization/Demobilization (in addition to fuel surcharge)	3.00/Mile
(800C2)	Mobil Home (Sleeps 6-8 Personnel)	2,100.00/Week

(900A)	Vacuum Tank Truck, 5500 Gallon Stainless Steel	80.00/Hour
(900A1)	Vacuum Tank, 5500, Gallon, Demurrage	250.00/Day
(900B)	Vacuum Tank Truck, 3000-3500 Gallon	65.00/Hour
(900B1)	Vacuum Tank, 3000-3500 Gallon, Demurrage	200.00/Day
-	Note: Daily and long term contract rates available for Vac-Trucks	-
(900C)	Storage Tankers, 8000-9500 Gallon Capacity	95.00/Day
(1000)	Work Boats, 24 linear feet, Delivery Additional	65.00/Hour
(1100)	Work Boats, 12-19 linear feet, Delivery Additional	250.00/Day
-	Note: For additional marine equipment, consult Marine Division	-
(1200)	All Terrain Vehicle (ATV)	110.00/Day
(1200A)	Gator All Terrain Vehicle	210.00/Day
(1300)	12'-16' Airboat (Shallow water and Marsh capable)	1,200.00/Day
(1400)	18'-24' Airboat (Shallow water and Marsh capable)	1,500.00/Day
(2000)	Rubber Tire Backhoe, Delivery Additional	550.00/Day
(2100)	Excavators, Small, i.e. Caterpillar 215, Delivery Additional	1,000.00/Day
(2200)	Excavators, Large, i.e. Caterpillar 320, Delivery Additional	1,300.00/Day
(2300)	Rubber Tire Loader, i.e. Caterpillar 936F, Delivery Additional	1,400.00/Day
(2400)	Track Loader, i.e. Caterpillar 955, Delivery Additional	650.00/Day
(2500)	Bulldozer, i.e. Caterpillar D-4H, Delivery Additional	700.00/Day
(2600)	Bobcat Loader, Delivery Additional	400.00/Day
(2700)	Mini-Excavator Crawler, Delivery Additional	450.00/Day
(3000)	Tandem Axle Tractor/Dump	60.00/Hour
(3000A)	Tandem Axle Tractor/Dump, Demurrage	150.00/Day
(3100)	Single Axle Tractor/Dump	45.00/Hour
(4000)	Roll-Off Box, 30 CY, Drop Charge Additional (see zones)	25.00/Day
(4100)	Roll-Off Box, 20 CY, Drop Charge Additional (see zones)	20.00/Day
(4200)	Roll-Off, Sealed Sludge Box, Drop Charge Additional (see zones)	21.00/Day
(4500)	45'-48' Van Trailer Demurrage	150.00/Day
(5000)	Air Compressor, 185 CFM	150.00/Day
(5100)	Air Compressor, < 185 CFM	95.00/Day
(5200)	Pressure Washer, Hot	180.00/Day
(5300)	Pressure Washer, Cold	115.00/Day
(5400)	50-Ton Rogers Equipment Transport Trailer/w. Tractor	95.00/Hour
(5500)	Service Truck, 16 Ton	85.00/Hour
(9000)	Frac Tank, Delivery Additional	150.00/Day

CODE	SUPPLIES & MATERIALS	\$ RATE
(S-01)	#100/#200 Sorbent Pads	83.00/Bale
(S-02)	8" Sorbent Boom	189.00/Bale
(S-03)	4"-5" Sorbent Boom	112.00/Bale
(S-04)	Sorbent Sweep	96.00/Bale
(S-05)	Sorbent Particulate	95.00/Bale
(S-06)	Sorbent Roll	115.00/Roll
(S-07)	Polyethylene Film, (6 Mil, 28X100)	105.00/Each
(S-08)	Polyethylene Bags, 55 Gallon, (6 Mil)	6.50/Each
(S-09)	Speedy Dry	9.75/Each
(S-10)	Drum, 17H (Open Head) 55 Gallon	54.00/Each
(S-11)	Drum, 17E (Closed Head) 55 Gallon	48.00/Each
(S-12)	Drum, Poly 55 Gallon	62.00/Each
(S-13)	Drum, Poly 30 Gallon	40.00/Each
(S-14)	Drum, Poly Overpak 85 Gallon	192.00/Each
(S-15)	Drum, Steel Overpak 85 Gallon	160.00/Each
(S-16)	Drum Liner, Poly	9.50/Each
(S-17)	5 Gallon DOT Shippable Pail	14.00/Each
(S-18)	Tempered Glass Drum Thieves (Drum Sample Rods)	9.00/Each
(S-19)	Gap Seal (1/2 Pound Pail)	26.00/Each
(S-20)	Barricade Tape	7.50/Each
(S-21)	Acid Pads	75.00/Bale

(S-22)	Cobra Coil	45.00/Box
(S-23)	Roll-Off Liner, 30 CY	48.00/Each
(S-24)	Roll-Off Liner, 20 CY	44.00/Each
(S-25)	Filter Fence	0.60/Ft. Day
(S-26)	Road Flares, Fusseses	2.00/Each
(S-27)	Purple-K, Amcrex #591	225.00/Each
(S-28)	Metal-X Extinguisher	250.00/Each
(S-29)	Class ABC Extinguisher, 25 Lbs.	45.00/Each
(S-30)	Class D Extinguisher, 25 Lbs.	250.00/Each
(S-31)	Lithix Extinguisher	400.00/Each
(S-32)	AFFF Foam, 5 Gallon Pail	185.00/Each
(S-33)	Acid/Caustic Vapor Suppressing Foam, 5 Gallon Pail	115.00/Each
(S-34)	Assorted Epoxy Kit	45.00/Each
(S-35)	Lead Wool Sheets (Lead & Okum)	10.00/Each
(S-36)	Rope, Polypropylene, 50', Replacement	22.00/Each
(S-37)	Edwards & Cromwell Leak Repair Kit	48.00/Day
(S-38)	Biosolve	14.50/Gallon
(S-39)	Haz-Mat Disposal Box, 36"x36"x36"	146.00/Each
(S-40)	Chemical Pads	94.00/Balc
(S-41)	Odor Gone	14.00/Gallon

CODE MONITORING & TESTING EQUIPMENT

CODE	MONITORING & TESTING EQUIPMENT	\$ RATE
(M-01)	MSA 361, Three Gas	75.00/Day
(M-02)	Quad Alarm, Four Gas	85.00/Day
(M-03)	MSA Colorimetric Gas Detection Kit	50.00/Day
(M-04)	MSA Colorimetric Test Tubes	17.00/Each
(M-05)	Photoionization Detector	120.00/Day
(M-06)	Field Screening Kit	80.00/Day
(M-07)	Haz-Cat Kit (Per Individual Test)	125.00/Each
(M-08)	Instrument Calibration	15.00/Each
(M-09)	Radiological Meters, White Kit	115.00/Day
(M-10)	Coliwassa	18.00/Each
(M-11)	PH Paper	9.90/Roll
(M-12)	Five Gas Meter (V-Rae)	110.00/Day
(M-13)	Jerome Meter (Mercury)	350.00/Day
(M-14)	Flame Ionization Detector	150.00/Day

CODE MISCELLANEOUS TOOLS & EQUIPMENT

CODE	MISCELLANEOUS TOOLS & EQUIPMENT	\$ RATE
(E-01)	Grounding/Bonding Equipment Kit	35.00/Day
(E-02)	Copper Grounding Rods, Replacement	15.00/Each
(E-03)	Dome Cover Clamps, MC-306, DOT-406	45.00/Each
(E-04)	Washout Offloader, MC-307, DOT-407	115.00/Day
(E-05)	Brass/ Beryllium Tool Set	85.00/Day
(E-06)	Heat Scanner	50.00/Day
(E-07)	Left Blank Intentionally	-
(E-08)	Explosion Proof Exhaust Fan, (Venturi) 10,000 CFM	85.00/Day
(E-09)	Drum Vacuum System	45.00/Day
(E-10)	Explosion Proof Lanterns	30.00/Day
(E-11)	Tank Truck Air Drill	85.00/Day
(E-12)	K-12 Demo Saw	85.00/Day
(E-13)	K-12 Replacement Blades	16.00/Each
(E-14)	Orange Safety Fence, 50' Roll with Stakes	155.00/Each
(E-15)	Orange Safety Fence, 100' Roll with Stakes	265.00/Each
(E-16)	Pneumatic Diaphragm Pump, Carbon Steel Casing	125.00/Day
(E-17)	Pneumatic Diaphragm Pump, Poly Casing	185.00/Day
(E-18)	Pneumatic Diaphragm Pump, Stainless Steel Casing	175.00/Day
(E-19)	Chemical Transfer Hose, 2"	1.00/Ft. Day

(E-20)	Chemical Transfer Hose, 3"	1.50/Ft. Day
(E-21)	Chemical Transfer Hose, 4"	2.00/Ft. Day
(E-22)	Containment Boom, 10", with anchors	0.65/Ft. Day
(E-23)	Containment Boom, 18", with anchors	1.15/Ft. Day
(E-24)	Containment Boom, 24", with anchors	1.65/Ft. Day
(E-24A)	Containment Boom, 42", with anchors	3.00/Ft. Day
(E-25)	Oil Skimmer, 48"	125.00/Day
(E-26)	DOT Approved Highway Cones	1.00/Unit
(E-27)	Illuminated DOT Approved Arrow Board	185.00/Day
(E-28)	48"X48" DOT Approved Traffic Warning Signs	35.00/Day
(E-29)	DOT Breakaway Barricades	25.00/Day
(E-30)	Halogen Work Light Towers	185.00/Day
(E-31)	Jack Hammer	85.00/Day
(E-32)	Jumping Jack	85.00/Day
(E-33)	Transit	115.00/Day
(E-34)	Plate Tamper	85.00/Day
(E-35)	Chlorine "A" Kit	250.00/Day
(E-36)	Chlorine "B" Kit	250.00/Day
(E-37)	Chlorine "C" Kit	300.00/Day
(E-38)	Cylinder Casket	450.00/Day
(E-39)	Acetylene Torches	75.00/Day
(E-40)	Generator, 4000 Watt	85.00/Day
(E-40A)	Generator, 6000 Watt	105.00/Day
(E-41)	Remote Drum Opener	300.00/Day
(E-42)	Remote Drum Opener Replacement Blades	95.00/Day
(E-43)	Pneumatic Plug & Leak Kit-Vetter System	185.00/Day
(E-44)	Sawzall	15.00/Day
(E-45)	Pneumatic Opener with CCTV (Reactive Chemicals)	800.00/Day
(E-46)	Wien Pump	18.00/Day
(E-47)	Oil Eataway	48.50/Lb.
(E-48)	Full Body Harness with Lifeline	25.00/Day
(E-49)	2" Trash Pump	80.00/Day
(E-50)	3" Trash Pump	90.00/Day
(E-51)	Wet/Dry HEPA Vacuum (filters additional)	200.00/Day
(E-52)	HEPA Filter Change	375.00/Each
(E-53)	Mercury Clean-up Kit (Multiple kits may be necessary for clean up)	200.00/Each
(E-54)	Explosion Proof Box Fan, 10,800 CFM	120.00/Day
(E-55)	Chain Saw	85.00/Day
(E-56)	Chlorine Transfer Hose	35.00/Ft. Day
(E-57)	Propane Transfer Hose	8.00/Ft. Day
(E-58)	Chlorine Tank Car Transfer Compressor	300.00/Hour
(E-59)	LP Tank Car Transfer Compressor	200.00/Hour
(E-60)	Flare Stack	200.00/Day
(E-61)	Pressurized Liquid Transfer Pump	125.00/Hour
(E-62)	Standard Wet/Dry Vacuum	45.00/Day
(E-63)	Mercury Vacuum (Filters Additional)	225.00/Day
(E-64)	Mercury Vacuum Filters and Jars	360.00/Each
(E-65)	Trailer Light Tower	265.00/Day
(E-66)	Electrical Fuel Transfer Pump	65.00/Day
(E-67)	Guzzler Pump	32.00/Day

CODE AGGREGATES, BACKFILL, SITE RESTORATION MATERIALS
\$ RATE

(SR-A)	Quarry Process	28.00/Ton
(SR-B)	Certified Clean Fill	32.00/Ton
(SR-C)	¾" Quarry Stone	27.00/Ton
(SR-D)	Asphalt, DGABC (20 Ton Minimum)	40.00/Ton
(SR-D)	Asphalt, DGABC (20 Ton Minimum)	40.00/Ton
(SR-E)	Asphalt, FABC (20 Ton Minimum)	42.00/Ton

RATE SCHEDULE-GENERAL INFORMATION:

1. Four-hour minimums apply to both personnel and equipment.
2. Time and one half charges apply from 1630 hours (4:30 PM) to 0800 Hours (8:00 AM), Monday through Friday, with exception to weekday holidays.
3. Time and one half charges apply on all Saturdays, with exception to Saturday holidays.
4. Double time will apply to all hours worked on Sundays and holidays. Holidays include: New Years Eve (After 1630 hours), New Years Day, Easter, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, Christmas Eve and Christmas Day.
5. The daily costs for "Day", where applicable, are for an eight-hour day. Any increment of a day will be charged as a full day.
6. Per Diem allowance of \$125.00 per day, per employee will be assessed to cover lodging and meals, where work of more than one day duration is 50 miles or more from the employee's office of origin. Partial Per Diem allowance of \$10.00 per day, per employee will be assessed to cover meal breaks. Customer will not be charged for meal costs.
7. All charges for labor and equipment rentals will be invoiced on a portal-to-portal basis.
8. All vehicle and heavy equipment rates are quoted without operators (equipment is not rented without operators).
9. Costs for boom repair damage incurred during a rental period, will be charged to the Customer.
10. Other materials and services not scheduled on rate sheet and tolls will be charged at invoice cost, plus 20% unless otherwise indicated. Any rental equipment meeting the description as a scheduled line item will be billed at the published line item rate.
11. Cleaning and disposal costs for materials generated during truck, trailer, roll-off, and/or cargo-tank truck cleaning will be charged for each vehicle.
12. Upon inspection, after vacuum tank truck work, Company reserves the right to have vacuum tank truck washed out. Customer will be responsible for costs incurred, plus 20% for any washout service. Customer reserves the right to inspect tanker prior to work place departure. If no inspection is conducted, customer will be deemed to have accepted the judgment of the contractor regarding the need for cleaning.
13. Published rates for levels of protection are inclusive of hazard pay associated with that specific entry.
14. **California Only-** Any emergency response requiring an individual employee to work in excess of twelve hours in a twenty-four hour cycle, will be charged out at double time rate for any hours worked in excess of twelve.
15. Any tire damage caused to Rubber Tire Heavy Machinery will be charged at replacement or repair cost plus 20%.
16. HMHTTC reserves the right to charge cost plus 20% at any time a published rate is equal to or less than the actual purchase price.
17. HMHTTC reserves the right to, from time to time, as warranted based on then increased fuel prices to charge a surcharge on all fuel consuming vehicles and equipment.

RESPONSE TO ALLEGED NOV_s
& IRLs

ATTACHMENT 7

List of Emergency Response Equipment

Elan Chemical Company, Inc.
Newark, NJ

Emergency Personal Protective Equipment Available

Type	Quantity	Location
Fire Blankets	2	See Chart, Front Crude and Back Vac
Oxygen Tanks	1	QC Lab
Respirators	Several	Prod Cabinets, Individuals Lockers
Tyvek Suits	Several	Foreman's office
Safety Shower/Eye Wash	4	Front Crude, Back Vac, Outside Crude, Crystallizer room
Fire Extinguishers	Several	See Chart
SCBA	2	Front Crude, Foreman's office
Defribillator	1	Lunch Room

Spill Kit Contents

Type	Quantity	Location(s)
3M absorbent pads	2 cases	Spill Cart
3M absorbent socks	3 cases	Spill Cart
Speedi-Dry	4 X 50 Lbs	Spill Cart
Brooms	2	Spill Cart-Prod Floor
Shovel	1	Spill Cart
Rubber Gloves	1 Dozen	Spill Cart- Prod Cab.
Tyvek Uniforms w/hood	1 case	Spill Cart, Foreman's office
Chem. Res. Goggles	2 pair	Spill Cart
Over-Pak Drums	4 X 55 gallons	Emerg. Trailer
SCBA	2	Front Crude, Foremen's office
Oxygen Tank	1	QC Lab
Hoses	Varied	Prod Floor, Maint
Portable Fire Extinguishers	Varied	See Chart
Water Jel Fire Blankets	2	See Chart

Warning Protection Devices

TYPE	LOCATION	ACTIVATION	LIMITATIONS
Portable Fire Extinguishers	See facility map	Manual	Small fires
Sprinkler Systems	Wet Systems for all buildings on the west side on Doremus Avenue	Automatic-melt away elements	Only over 165° F
Alarm Systems	West side on Doremus Avenue	Automatic-Valve tampering flow alarm	None
Alarm Company Contracts	ADT-Alarm system and phone line		
Telephones	Throughout facility		
Intercom		Press "page" button on phone	

Date Checked: 5/1/06

FIRE EXTINGUISHER INSPECTION LIST

Checked by: EKT

#	Location	Type	Test Date	Comment
1	Lunch Room	ABC	2002	OK
2	Entrance to Front Crude	ABC	2002	OK
3	QC Lab by door	ABC	2002	OK
4	QC Lab	CO	2002	OK
4B	QC Lab	ABC	2002	OK
5	Front Crude	ABC	2002	OK
6	Front Crude PFD 1	ABC	2002	OK
7	Front Crude R12 Platform	ABC	2002	OK
8	Front Crude R12 Platform	ABC	2002	OK
9	Front Crude S 9	ABC	2002	OK
10	Front Crude S6	ABC	2002	OK
11	Foreman's Office Entry	ABC	2002	OK
12	Vac Rm Side door	ABC	2002	OK
13	Vac Rm S 27	ABC	2002	OK
14	Still #28	ABC	2002	OK
15	Back Crude Pfd 5 Platform	ABC	2002	OK
16	Back Crude Lab	ABC	2002	OK
17	Back Crude Lab	ABC	2002	OK
18	Back Crude R 36	CO	2002	OK
19	Back Crude R 36	ABC	2002	OK
20	Boiler Rm Door	ABC	2002	OK
21	Boiler Rm Back Door	ABC	2002	OK
22	Pipe Shop	ABC	2002	OK
23	Supply Container	ABC	2002	OK
24	Weld Shop 1	CO	2002	OK
25	Weld Shop 2	ABC	2002	OK
26	Welding Torch	ABC	2002	OK - No tag
27	Hydrogen Bank	ABC	2002	OK
28	Crystallizer Rm Door	ABC	2002	OK
29	Cryst Rm Dryer 1	ABC	2002	OK
30	Cryst Rm Compressor	ABC	2002	OK
30	Cryst Room	ABC	2002	OK
31	Cryst Rm S40	ABC	2002	OK
32	Crysst Rm Platform	ABC	2002	OK
33	Back Brine Unit	ABC	2002	OK
34	Wood Resin Centrifuge	ABC	2002	OK
35	Wood Resin T110	ABC	2002	OK
36	Still 17	ABC	2002	OK
37	Still 17 Platform	ABC	2002	OK
38	Cooling Towers T104D	ABC	2002	OK
39	Warehouse Door 1	ABC	2002	OK
40	Warehouse Door 2	ABC	2002	OK
41	Warehouse Back Door	ABC	2002	OK
42	Vanilla Entry	ABC	2002	OK

Date Checked:

5/1/04

FIRE EXTINGUISHER INSPECTION LIST

Checked by:

SKJ

#	Location	Type	Test Date	Comment
43	Vanilla Back Door 1	ABC	2002	OK
44	Vanilla Back Door 2	ABC	2002	OK
45	Vanilla Lab	ABC	2002	OK
46	Vanilla Extractor 1	ABC	2002	OK
47	Vanilla Extractor 3	ABC	2002	OK
48	Vanilla Platform	ABC	2002	OK
49	Front Office by copier	ABC	2002	OK
50	Front Office stair	ABC	2002	OK
51	Back Office	ABC	2002	OK
52	Front Office upstairs	ABC	2002	OK
53	Vanilla Office	ABC	2002	OK
54	Auto 4	ABC	2002	OK
55	Tank 102 (2)	ABC	2002	OK - OK (no tag)
56	TBR tank	ABC	2002	OK
57	Reactor 35	ABC	2002	OK
57	Reactor 35	ABC	2002	OK (notag) - OK (notag)
58	PFD 8	ABC	2002	OK
59	Effluent Pump Room	ABC	2002	OK
60	Front Crude Door	CO	2002	OK
61	Lunch Room Air Pack	AIR	2002	OK
62	Cryst Rm. Air Pack	AIR	2002	OK
63	Research Lab	ABC	2002	OK
64	Research Lab	ABC	2002	OK
65	Research Lab	ABC	2002	OK
66	Research Lab	ABC	2002	OK
67	Research Lab	ABC	2002	OK
68	Front Office	ABC	2002	OK
69	CPR Air Supply-QC Lab			OK
70	Res. Lab-Front Door	ABC	2002	OK
71	Res. Lab-Storage Room	ABC	2002	OK
	Spill Gun		2002	OK
72	Plant Air pack		2002	OK
73	Res. Lab- Air Pack		2002	OK
74	Hot Oil System	ABC	2002	OK
74	Hot Oil System	ABC	2002	OK
75	Methanol tank	ABC	2002	OK
76	BackCrude 3rd. Floor	ABC	2002	OK
77	Warehouse AirPack	AIR	2002	OK
	Em.Blanket-Front Crude			Needs replacing
	Em.Blanket-Back Crude			" "
78	ResLab-Emerg Exit Air	Air		OK
79	Whouse-ForemnOffice	ABC	2002	OK
80	Reactor 17 Fire System	B	2002	NOT WORKING
81	Hot Oil Fire Suppr System		2002	OK
82	Sales Office	ABC	2002	OK
83	Reactor 17 Combustible Metal	D	2002	OK
84	Res Lab - Back Lab	ABC		OK

RESPONSE TO ALLEGED NOV_s
& IRLs

ATTACHMENT 8

Copy of Evacuation Plan
&
Emergency Procedures

Elan Chemical Company, Inc.
Newark, NJ

BASIC EVACUATION PLAN

In the event of an evacuation, the following procedure should be followed.

Employees

1. Evacuate area immediately through the nearest unobstructed exit.
2. Call 911 if necessary.
3. Alert plant personnel over the P.A. system. Press "page" button, state and repeat message.
4. Walk to the emergency assembly area located at the parking lot, warehouse driveway, and/or front of the building, for head count.
5. Follow instructions of ERT Coordinator and Members.

MESSAGE: "Your attention please. Evacuate the building immediately through the nearest exit. Walk to the parking lot, warehouse driveway, and/or front of the building."

6. Notify Emergency Response Coordinator - to call Fire Department.
7. Department Supervisors are to check for injuries and missing personnel. If injuries occur, contact the First Aid Personnel or a Supervisor. Call the Rescue Squad and/or Fire Department, if needed.

Supervisors/Foremen

1. Upon notification of evacuation via alarms, verbal or PA, employee must evacuate area immediately through the nearest unobstructed exit. Walk to your designated area at the parking lot, warehouse driveway, and/or front of the building.
2. Report to designated area for head count. Perform head count for the department.
3. Report head count to the Emergency Coordinator.
4. If emergency incident happened in the supervisor's area, detailed information must be reported to Emergency Coordinator immediately.

Emergency Response Team (ERT)

1. Call 911, if immediate emergency services are needed.
2. ERT members will assist in the orderly evacuation of their assigned areas. They will initiate search of their designated areas including the restrooms, and closed rooms if safe to do so to assure all employees, visitors, and contractors, etc. have left the building.
3. The team members will then proceed to the command center to report all information (evacuation status, hazards in the area, etc.) to the Emergency Response Coordinator.

4. The Emergency Response Coordinator will relay the evacuation status and hazard information to necessary outside emergency services (i.e. fire department).
5. A decision will be made by the Emergency Response Coordinator and key company personnel to determine the status of the evacuation
6. Personnel may not enter the area until the fire department releases the site and indicates it is safe to do so.

CHEMICAL RELEASE PROCEDURES

The Emergency Procedures required in the event of a release of hazardous waste or materials are as follows:

Identifying Employee

1. Evacuate out of immediate area. Also notify employees in the immediate area to keep out of area. Protect Personnel – Anyone wet by flammable liquids should remove the soaked garments and thoroughly wash the effected skin with soap and water. Personnel close to the spills potentially harmfully vapors should evacuate.
2. Eliminate ignition sources – Cigarettes should be extinguished and any spark or flame producing operation should be shut down within the vapor-spread area of the spill. Flammable liquid vapors are often heavier than air and spread naturally along the floor from higher to lower elevations. Ignition sources below and even some distances away from a spill may be vulnerable.
3. Call 911, if immediate emergency services are needed. Notify the Emergency Response Coordinator/Emergency Response Team via the PA system. Notify your immediate supervisor.
4. **DO NOT ATTEMPT TO CLEAN UP THE SPILL.**

Emergency Response Team

Call 911, if immediate emergency services are needed.

1. Isolate immediate area.
 - ~ Evacuate all non-essential personnel.
 - ~ Keep all personnel out of spill area. The area should be secured.

2. Identify the spilled/released material
 - ~ Identify the cause of the spill/release.
3. Determine the risk and hazards associated with the release.
 - ~ MSDS are available on site.
 - ~ Hazardous chemical exposure levels must be quantified.

If the hazards are not too great and are manageable with proper procedures and protective equipment, the ERT may follow control and decontamination procedure if they choose to do so.

4. Obtain the required personal protective equipment for the incident.
 - ~ All personnel entering the area must don the required personal protective equipment.
 - ~ Please refer to the emergency equipment section of the Emergency Plan.
5. Notify ERT members before entering area for control.
 - ~ No ERT member may act alone.
6. Control the hazards.
 - ~ ONLY IF IT IS SAFE TO DO SO!
 - ~ If material is flammable, shut down or eliminate all sources of ignition.
 - ~ Ventilate where possible.
 - ~ Contain the spill if safe to do so. Contain the spill - Attempt to restrict the spread of the spill. Minimizing the surface area of the spill reduces the formation of flammable vapors.
 - ~ Spill containment tools include absorbents (pillows, socks and pads), non-sparking shovel and squeegees, etc. Sufficient absorbent material to control a possible spill should be kept on hand.
 - ~ All spill control equipment must be spark-proof.
 - ~ If a drum was punctured turn the drum so the puncture is facing up thus preventing more material to be released.
7. Decontaminate area using approved materials.
 - ~ Any material that can be reused should be cleaned up first. The remaining waste should be cleaned up and placed in clean drum.
 - ~ All contaminated material is to be removed and handled in the same manner. All equipment used during the clean up operation should be cleaned and put back in the proper location. After the clean up is complete, the supervisor of the department should be notified that plant operation might continue.
 - ~ All emergency response personnel involved with the clean up of the spill must go through decontamination.

8. Termination

- ~ Emergency Response Team must gather and complete the Incident Report.
- ~ Call United States Compliance for guidance (952) 252-3000.
- ~ Appropriate agencies must be called if release thresholds or reportable quantities (RQ) are exceeded.
- ~ Steps must be taken to prevent a similar event from occurring.
- ~ Retraining to be scheduled as needed.

FIRE

The basic Emergency Procedures required in the event of a fire are as follows:

Identifying Employee

1. Evacuate area immediately through the nearest unobstructed exit.
2. Call 911 if necessary.
3. Alert plant personnel over the P.A. system. Press "page" button, state and repeat message.
4. Walk to the emergency assembly area located at the parking lot, warehouse driveway, and/or front of the building, for head count.

MESSAGE: "Your attention please. Evacuate the building immediately through the nearest exit. Walk to the parking lot, warehouse driveway, and/or front of the building."

5. Notify Emergency Response Coordinator - to call Fire Department.
6. Department Supervisors are to check for injuries and missing personnel. If injuries occur, contact the First Aid Personnel or a Supervisor. Call the Rescue Squad and/or Fire Department, if needed.
7. After the fire is extinguished, all affected areas are to be cleaned up and wastes properly disposed of before resuming operations.

Emergency Response Team (ERT)

1. Call 911, if immediate emergency services are needed.
2. Isolate immediate area. Evacuate all personnel. Keep all personnel from entering the building and non-emergency personnel from entering the property. The area should be secured.
3. Conduct head count.
4. Remove materials from surrounding areas that might add to the fire if safe to do so.
5. Send individual out to meet the Emergency Vehicles.
6. Allow Emergency Response Coordinator and local Fire Department to take charge when they arrive.
7. Emergency Response Coordinator will relay all known information regarding the incident to the fire department upon arrival.
8. After the fire is extinguished, all areas affected are to be cleaned up and wastes properly disposed of before resuming operations.
9. If a hazardous substance has been released, the Emergency Response Coordinator is to notify the necessary Response Centers. Follow hazardous material release protocol.

10. Emergency Response Coordinator will notify personnel when it is safe to reenter the facility. This may not be done until the fire department says it is safe to do so.

11. Termination

- ~ Emergency Response Team must gather and complete the Incident Report.
- ~ Appropriate agencies must be called if certain release levels or reportable quantities (RQ) are exceeded.
- ~ Call United States Compliance for guidance (952) 252-3000.
- ~ Steps must be taken to prevent a similar event from occurring.
- ~ Retraining to be scheduled as needed

EXPLOSION

The Emergency Procedures required for an explosion are as follows:

Identifying Employee

1. Evacuate area immediately through the nearest unobstructed exit. Walk to the emergency assembly area located at the parking lot, warehouse driveway, and/or front of the building.
2. Dial 911.
3. Alert plant personnel over the P.A. system. Press "page" button, state, and repeat message.

MESSAGE: "Your attention please. Evacuate the building immediately through the nearest exit. Walk to the parking lot, warehouse driveway, and/or front of the building."

4. Notify Emergency Response Coordinator - to call Fire Department.
5. Department Foremen are to check for injuries and missing personnel. If injuries occur, contact the First Aid Personnel or a Supervisor. Call the Rescue Squad and/ or Fire Department, if needed.
6. After the fire is extinguished, all areas affected are to be cleaned up and wastes properly disposed of before resuming operations.

Emergency Response Team (ERT)

1. Call 911, if immediate emergency services are needed.
 - ~ Isolate immediate area.
 - ~ Evacuate all personnel.
 - ~ Keep all personnel from entering the building or non-emergency personnel from entering the property. The area should be secured.
2. Conduct head count.
3. Remove materials from surrounding areas that might add to the fire if safe to do so.
4. Send individual out to meet the Emergency Vehicles.
5. Allow Emergency Response Coordinator and local Fire Department to take charge when they arrive.
6. Emergency Response Coordinator will relay all known information regarding the incident to the fire department upon arrival.
7. After the fire is extinguished, all areas affected are to be cleaned up and wastes properly disposed of before resuming operations.

8. If a hazardous substance has been released, the Emergency Response Coordinator is to notify the necessary Response Centers. Follow hazardous material release protocol.
9. Emergency Response Coordinator will notify personnel when it is safe to reenter the facility.
10. This may not be done until the fire department says it is safe to do so.
11. Termination
 - ~ Emergency Response Team must gather and complete the Incident Report.
 - ~ Appropriate agencies must be called if certain release levels or reportable quantities (RQ) are exceeded.
 - ~ Call United States Compliance for guidance (952) 252-3000.
 - ~ Steps must be taken to prevent a similar event from occurring.
 - ~ Retraining to be scheduled as needed.

00147

8. If a hazardous substance has been released, the Emergency Response Coordinator is to notify the necessary Response Centers. Follow hazardous material release protocol.
9. Emergency Response Coordinator will notify personnel when it is safe to reenter the facility.
10. This may not be done until the fire department says it is safe to do so.
11. Termination
 - ~ Emergency Response Team must gather and complete the Incident Report.
 - ~ Appropriate agencies must be called if certain release levels or reportable quantities (RQ) are exceeded.
 - ~ Call United States Compliance for guidance (952) 252-3000.
 - ~ Steps must be taken to prevent a similar event from occurring.
 - ~ Retraining to be scheduled as needed.

MEDICAL EMERGENCY

This procedure will be followed when an injury or sudden illness occurs. The designated company emergency responders will assess the situation to determine the need for outside emergency response. The responders will err on the side of caution when in question.

Identifying Employee

1. If an employee becomes injured or suddenly ill, the employee shall notify the emergency response personnel via the P.A. system.
2. 911 will be called if the condition appears to be severe.
3. When paging, the requesting person should clearly state where the emergency responders are needed.
4. The immediate supervisor and emergency response personnel will be summoned immediately for all medical emergencies.
5. Isolate immediate area.
6. Stay with victim until help arrives.

Emergency Response Team (ERT)

1. Individuals designated to respond to medical emergencies are to immediately go to the location indicated on the page.
2. Area will be assessed for all relevant hazards.
3. The injury or illness will be assessed to determine if additional assistance is necessary. Call 911, if immediate emergency services are needed.
4. If 911 is called someone will be assigned to wait near the entrance of the property to meet the paramedics at the door and to guide them to the victim.
5. Isolate immediate area. Keep all non-essential personnel from entering the area.
6. Identify hazard or cause. All hazards must be controlled.
7. All responders must don appropriate personal protective equipment (see Blood Borne Pathogen and Personal Protective Equipment Programs).
8. Notification of team members.
9. Care to be given to victim in accordance with First Aid & CPR Training.
10. All injured personnel will be accompanied by a supervisor or assigned personnel if sent off-site for medical treatment.
11. Once victim has been taken care of, decontamination procedures will begin in accordance with the Blood Borne Pathogen Program.
12. After decontamination of the area and response personnel, the team will meet to complete the appropriate paperwork.

ELAN CHEM



JKM 7/12/01

RESPONSE TO ALLEGED NOV_s
& IRL_s

ATTACHMENT 9

Copy of Letter Transmitting Elan's
Contingency and Emergency Plan to the City of
Newark Fire Department

Elan Chemical Company, Inc.
Newark, NJ



268 DOREMUS AVENUE
NEWARK, NJ 07105
(973) 344-8014
FAX (973) 344-1948
www.elan-chemical.com
EMAIL sales@elan-chemical.com

July 17, 2006

Mr. James W. Stewart
Fire Official
Newark Fire Department
1010 – 18th Ave.
Newark, NJ 07106

Dear Mr. Stewart,

As per your letter dated November 14, 2005, the Newark Fire department has agreed to respond to any and all fire related emergencies or Hazardous Material incidences at Elan Chemical Co. Inc. located at 268 Doremus Ave in Newark.

For your reference, I have enclosed an updated copy of our Contingency and Emergency Plan.

Please contact me at 973-344-8014 x 159 or at mguerrera@elan-chemical.com if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Guerrero", written over a horizontal line.

Mary Guerrero
Director of Quality Assurance & Regulatory Affairs
Elan Chemical Co., Inc.

RESPONSE TO ALLEGED NOV_s
& IRLs

ATTACHMENT 10

Copy of Manifests

Elan Chemical Company, Inc.
Newark, NJ

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

P.O. Box 13087

Austin, Texas 78711-3087



Canisters
DISPOSAL OF R&D MATERIALS

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ0042895680	Manifest Document No. 08038	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Elan Chemical Co. 268 Doremus Ave Newark, NJ 07105-			A. State Manifest Document Number 3790458			
4. Generator's Phone () 973-344-8014			B. State Generator's ID D0034			
5. Transporter 1 Company Name Freehold Cartage, Inc.			6. US EPA ID Number NJ0054126164		C. State Transporter's ID 40705	
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone (732) 462-1001	
9. Designated Facility Name and Site Address SET Environmental, Inc. 5743 Cheswood Houston, TX 77087-			10. US EPA ID Number TX0055135388		E. State Transporter's ID	
					F. Transporter's Phone	
					G. State Facility's ID 50267	
					H. Facility's Phone (713) 645-8710	
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
X	a. Chlorine 2.3 (8) UN1017 Inhalation hazard zone B		3	CY	3	P
X	b. Sulfur dioxide 2.3 (8) UN1079 Inhalation hazard zone C		1	CY	1	P
	c.					
	d.					
J. Additional Descriptions for Materials Listed Above Emergency Phone: 973-344-8014			K. Handling Codes for Wastes Listed Above a.H121 b.H121			
15. Special Handling Instructions and Additional Information a.59313:01, 02, 03 b.59313:04						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Ben Armenti			Signature <i>Ben Armenti</i>		Month Day Year 09 04 06	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature <i>George Hausser</i>		Date Month Day Year 09 05 06	
Printed/Typed Name George Hausser			Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature		Date Month Day Year	
Printed/Typed Name			Signature		Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name			Signature		Date Month Day Year	



P.O. BOX 5010 • FREEHOLD, NJ 07728-5010
(732) 462-1001 • FAX (732) 308-0924

FCI EPA ID NO. NJD054126164

R34491

114 Schoolground Rd.
Branford, CT 06405
Phone: (203) 483-5964
Fax: (203) 483-5984

350 Pigeon Point Road
New Castle, DE 19720
Phone: (302) 658-2005
Fax: (302) 658-6229

175 Bartow Mun. Airport
Bartow, FL 33830
Phone: (863) 533-4599
Fax: (863) 533-1613

5533 Dunham Road
Maple Heights, OH 44137
Phone: (330) 835-3473
Fax: (330) 835-3732

108 Monahan Avenue
Dunmore, PA 18512
Phone: (570) 342-7232
Fax: (570) 342-7367

40 Boulevard St.
Sumter, SC 29150
Phone: (803) 773-2611
Fax: (803) 773-2942

SHIPPER NAME/ADDRESS Elan Chemical 268 Doremus Ave Newark NJ		PHONE 973-344-8014 (AREA CODE) 843		TRAILER 4686		APPOINTMENT TIME NJD042895690	
FCI REP. LOADING (PRINT) George Hausser	PROCEDURE A/C	EQUIP. SPOTTED -	EQUIP. REMOVED -	TIME AT SHIPPER (MILITARY TIME ONLY) 11:45		ARRIVAL TIME 11:45	
COMMENTS OR DELAYS AT SHIPPER Contact: Ben Armenti				EQUIPMENT USED			

BROKER: S.E.T. Environmental	MANIFEST / DOCUMENT NO. 06051
PO#:	WO#:

(X) HM	PROPER U.S. D.O.T. SHIPPING NAME	U.S. D.O.T. HAZARDOUS CLASS	NA/UN/NO.	PACKING GROUP	NO. CONT.	CONT. TYPE	NET QUANTITY	UNIT MEASURE	WASTE NO.	FORM
1	See Manifest									
2										
3										

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION NUMBER. 2 (10 gallon) drums

SHIPPER'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The materials described above were consigned to the Transporter named. The consignee can and will accept the shipment and has a valid permit to do so if required. I certify that the foregoing is true and correct to the best of my knowledge.

Payment to the contractor for waste removal does not constitute payment to the carrier and if the contractor does not pay the carrier, the shipper is obligated to pay the agreed rate offered to the contractor.

PLEASE PRINT NAME/TITLE BEN ARMENTI	SHIPPER'S SIGNATURE X	DATE LOADED 6/5/06 MO. DAY YR.
---	---------------------------------	---

CONSIGNEE NAME/ADDRESS Freehold Cartage Inc. 108 Monahan Ave Dunmore PA		PHONE 973-344-8014 (AREA CODE) 843		TRAILER 4686		APPOINTMENT TIME NJD054126164	
FCI REP. UNLOADING (PRINT) George Hausser	PROCEDURE Del	EQUIP. SPOTTED -	EQUIP. REMOVED -	TIME AT CONSIGNEE (MILITARY TIME ONLY) 11:45		ARRIVAL TIME 11:45	
COMMENTS OR DELAYS AT CONSIGNEE				EQUIPMENT USED			

PLEASE PRINT NAME/TITLE	CONSIGNEE SIGNATURE X	DATE UNLOADED 6/5/06 MO. DAY YR.
-------------------------	---------------------------------	---

AR H-0257	MD HWH-167	MO H-1490	OH UPW-0190713-OH	TX 40705
CT CT-HW-307	2001-OPV-2335	ND WH-429	OK UPW-0190713-OH	WI 11602
DE DE-HW-203	ME ME-HWT-47	NH TNH-0047	ONTARIO, CANADA A 840943	WV UPW-0190713-OH
DE-SW-203	ME WOT-47	NJ S-2265	PA PA-AH-0067	
IL UPW-0190713-OH	MI UPW-0190713-OH	15939	QUEBEC, CANADA QC-6ML-047	
MA MA-294	MN UPW-0190713-OH	NY NJ-113	RI RI-535	

White - FCI Original
Yellow - FCI Billing
Blue - FCI Office/Customer
Green - Retained by TSDF
Gold - Retained by Generator

R34491



R+D Lab

State of New Jersey
Department of Environmental Protection
Hazardous Waste Regulation Program
Manifest Section



P.O. Box 414, Trenton NJ 08625-0414

Form Approved OMB No. 2050-0039

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.
NJ00042 000000000000

Manifest
Document No. 3

2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ELAN CHEMICAL COMPANY
200 CONEILUS AVE.
NEWARK NJ 07102

State Manifest Document Number
NJ00042 000000000000

4. Generator's Phone () 973 644 1114

5. Transporter 1 Company Name
MUNICIPAL

6. US EPA ID Number
NJ00002 4040000

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
FACTORY LANE
NEWARK NJ 07102

10. US EPA ID Number
NJ00002 4040000

11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group)
HM
WASTE METHYL VINYL KETONE, STABILIZED
POISON INHALATION HAZARD ZONE A
A 103 B UN 1201 PG I ERG 1400

12. Containers

13. No.

14. Type

15. Total Quantity

16. Unit

17. Waste No.

18. WASTE CHLOROACETONE
POISON INHALATION HAZARD ZONE B
A 103 B UN 1201 PG I ERG 1400

19. WASTE ETHYL CHLOROFORMATE
POISON INHALATION HAZARD ZONE B
A 103 B UN 1201 PG I ERG 1400

20. WASTE TRIMETHYLACETYL CHLORIDE
POISON INHALATION HAZARD ZONE B
A 103 B UN 1201 PG I ERG 1400

21. Additional Descriptions for Materials Listed Above

22. Special Handling Instructions and Additional Information

23. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

24. I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and I select the best waste management method that is available to me and that I can afford.

25. Printed/Typed Name

26. Signature

27. Month Day Year

28. Transporter 1 Acknowledgement of Receipt of Materials

29. Printed/Typed Name

30. Signature

31. Month Day Year

32. Transporter 2 Acknowledgement of Receipt of Materials

33. Printed/Typed Name

34. Signature

35. Month Day Year

36. Discrepancy Indication Space

37. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

38. Printed/Typed Name

39. Signature

40. Month Day Year

NJA 5283050

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. NJ10042885680	Manifest Document No. 83050	22. Page 2 of 5	Information in the shaded areas is not required by Federal law.	
23. Generator's Name ELAN CHEMICAL COMPANY 208 DOREMUS AVE. NEWARK, NJ 07105				L. State Manifest Document Number NJ1A5283050		
				M. State Generator's ID		
24. Transporter Company Name		25. US EPA ID Number 873/344-8014		N. State Transporter's ID		
				O. Transporter's Phone		
26. Transporter Company Name		27. US EPA ID Number		P. State Transporter's ID		
				Q. Transporter's Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers	30. Total Quantity	31. Unit Wt/Vol
				No.	Type	R. Waste No.
a.	X	WASTE ALLYL ALCOHOL "POISON INHALATION HAZARD" ZONE B 6.1(3) UN1008 PG I ERG 131 DRUM #64		- - 1	DF	- - - - 9 P P005
b.	X	WASTE PHOSPHORUS TRICHLORIDE "POISON INHALATION HAZARD" ZONE B 6.1(8) UN1902 PG I ERG 137 DRUM #14 30		- - 2	DF	- - - 18 P D003
c.	RQ	WASTE ETHYLENE DIBROMIDE "POISON INHALATION HAZARD" ZONE B 6.1 UN1805 PG I RQ=U067 ERG 154 DRUM #05		- - 1	DF	- - - - 9 P U067
d.	X	WASTE METHYL IODIDE "POISON INHALATION HAZARD" ZONE B 6.1 UN2044 PG I ERG 151 DRUM #29		- - 1	DF	- - - - 8 P U139
e.	X	WASTE FLAMMABLE LIQUID, CORROSIVE, N.O.S. (PROPYLENE DIAMINE, TRIETHYLAMINE) 3(8) UN2024 PG II ERG 132 DRUM #02		- - 1	DM	- - 125 P U404
f.	X	WASTE FLAMMABLE LIQUID, CORROSIVE, N.O.S. (FORMALDEHYDE, ACETYL CHLORIDE) 3(8) UN2024 PG II ERG 132 DRUM #04		- - 1	DF	- - 125 P U122
g.	RQ	WASTE FLAMMABLE LIQUID, TOXIC, N.O.S. (ETHYLENE DICHLORIDE, TETRAHYDROFURAN) 3(8 1) UN1902 PG I RQ=D001 ERG 131 DRUM #08		- - 1	DM	- - 150 P U077
h.	RQ	WASTE FLAMMABLE LIQUID, TOXIC, N.O.S. (ETHYLENE DICHLORIDE, PYRIDINE) 3(8 1) UN1902 PG I RQ=D001 ERG 131 DRUM #13		- - 1	DM	- - 150 P U195
i.	X	WASTE FLAMMABLE LIQUIDS, N.O.S. (ISOBUTYL NITRITE) 3 UN1903 PG II ERG 128 DRUM #20		- - 1	DF	- - - - 8 P D001
S. Additional Descriptions for Materials Listed Above 28A L/I, H, 1X55GAL. 28B L/R, C, 2X55GAL. 28C L/T, 1X55GAL. 28D L/R, T, 1X55GAL. 28E L/I, C, T, 1X55GAL. 28F L/I, R, C, T, 1X300GAL. 28G L/I, T, E, 1X55GAL. 28H L/I, T, E, 1X55GAL. 28I L/I, 1X55GAL.				T. Handling Codes for Wastes Listed Above		
32. Special Handling Instructions and Additional Information						
33. Transporter Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name				Signature		Month Day Year
34. Transporter Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name				Signature		Month Day Year
35. Discrepancy Indication Space						

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. NJID042895680	Manifest Document No. 83050	22. Page 3 of 5	Information in the shaded areas is not required by Federal law.	
23. Generator's Name ELAN CHEMICAL COMPANY 208 DOREMUS AVE. NEWARK, NJ 07105				L. State Manifest Document Number NJ1A5283050		
24. Transporter _____ Company Name				M. State Generator's ID		
25. US EPA ID Number 973/344-8014				N. State Transporter's ID		
26. Transporter _____ Company Name				O. Transporter's Phone		
27. US EPA ID Number				P. State Transporter's ID		
				Q. Transporter's Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers	30. Total Quantity	31. Unit Wt/Vol
				No.	Type	R. Waste No.
a.	X	WASTE TITANIUM TETRACHLORIDE "POISON INHALATION HAZARD" ZONE B B(6.1) UN1838 PG II ERG 137 DRUM #27	--1	DF	---9	P D002
b.	X	WASTE PHOSPHORUS OXYCHLORIDE "POISON INHALATION HAZARD" ZONE B B(6.1) UN1810 PG II ERG 137 DRUM #32	--1	DF	---10	P D002
c.	X	WASTE BORON TRIBROMIDE "POISON INHALATION HAZARD" ZONE B B(6.1) UN2802 PG I ERG 147 DRUM #14	--1	DF	---9	P D003
d.	X	WASTE CORROSIVE LIQUID, FLAMMABLE, N.O.S. (MORPHOLINE, DIBUTYLAMINE) B(3) UN2020 PG I ERG 132 DRUM #04	--1	DF	---25	P D001
e.	X	WASTE CORROSIVE LIQUID, FLAMMABLE, N.O.S. (ACETIC ANHYDRIDE, ACRYLIC ACID) B(3) UN2020 PG II ERG 132 DRUM #18	--1	DM	---80	P U008
f.	X	WASTE CORROSIVE LIQUID, TOXIC, N.O.S. (TRICHLOROACETIC ACID, FORMIC ACID) B(6.1) UN2022 PG II ERG 154 DRUM #19	--1	DM	---80	P U123
g.	RD	WASTE CORROSIVE LIQUID, OXIDIZING, N.O.S. (PHOSPHORIC ACID, NITRIC ACID) B(5.1) UN3093 PG II ERG=D002 ERG 140 DRUM #22	--1	DM	---150	P D001
h.	X	WASTE CORROSIVE LIQUID, TOXIC, N.O.S. (BUTYLPHENOL, METHYLBENZYL AMINE) B(6.1) UN2022 PG II ERG 154 DRUM #17	--1	DM	---80	P D002
i.	X	WASTE CORROSIVE SOLID, ACIDIC, ORGANIC, N.O.S. (MALEIC ANHYDRIDE, PHTHALIC ANHYDRIDE) B UN3201 PG III ERG 154 DRUM #01	--1	CF	---425	P U190
S. Additional Descriptions for Materials Listed Above 29A L/C 1X55GAL 29B L/C 1X55GAL 29C L/R C 1X55GAL 29D L/I C 1X15GAL 29E L/I C T 1X55GAL 29F L/C T 1X55GAL 29G L/I C E 1X55GAL 29H L/C 1X55GAL 29I S/T 1XCU YD				T. Handling Codes for Wastes Listed Above		
32. Special Handling Instructions and Additional Information 29I DOT-E12296.						
33. Transporter _____ Acknowledgement of Receipt of Materials						Date
Printed/Typed Name				Signature		Month Day Year
34. Transporter _____ Acknowledgement of Receipt of Materials						Date
Printed/Typed Name				Signature		Month Day Year
35. Discrepancy Indication Space						



UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. NJ10042895680	Manifest Document No. 83050	22. Page 4 of 5	Information in the shaded areas is not required by Federal law.		
23. Generator's Name ELAN CHEMICAL COMPANY 268 DOREMUS AVE. NEWARK, NJ 07105				L. State Manifest Document Number NJ1A5283050			
24. Transporter Company Name				M. State Generator's ID			
25. US EPA ID Number				N. State Transporter's ID			
26. Transporter Company Name				O. Transporter's Phone			
27. US EPA ID Number				P. State Transporter's ID			
				Q. Transporter's Phone			
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers No.	30. Total Quantity	31. Unit Wt/Vol	
				Type		R. Waste No.	
a.	X	WASTE CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S. (AMMONIUM HYDROXIDE, SODIUM HYDROXIDE) B. UN3280 PG II ERG 154 DRUM #10		--1	DF	--20 P	D002
b.	X	WASTE FLAMMABLE SOLID, CORROSIVE, INORGANIC, N.O.S. (SODIUM AMIDE, SULFUR) 4.1(8) UN3180 PG II ERG 134 DRUM #47		--1	DF	--12 P	D001
c.	X	WASTE FLAMMABLE SOLID, CORROSIVE, ORGANIC, N.O.S. (S-TRIOXANE, POTASSIUM-TERT-BUTOXIDE) 4.1(8) UN2925 PG II ERG 134 DRUM #11		--1	DF	--25 P	D001
d.	X	WASTE DINITROPHENOLATES, WETTED 4.1(8.1) UN1321 PG I ERG 113 DRUM #25		--1	DF	---8 P	D001
e.	X	WASTE ORGANOMETALLIC FLAMMABLE (METHYLMAGNESIUM CHLORIDE, TETRAHYD FURAN) 3(3) UN3380 PG I ERG 138 DRUM #10		--1	DF	---9 P	D001
f.	X	WASTE WATER-REACTIVE LIQUID, CORROSIVE, N.O.S. (N-BUTYLLITHIUM, SODIUM BIS(2-METHOXYETHOXY)AL- UMINUM HYDRIDE) 3(8) UN3129 PG I ERG 138		--1	DF	--12 P	D001
g.	X	WASTE WATER-REACTIVE SOLID, FLAMMABLE, N.O.S. (CALCIUM CARBIDE, PHOSPHORUS PENTASULFIDE) 4.3(4.1) UN3132 PG I ERG 138 DRUM #23		--1	DF	--35 P	D001
h.	RO	WASTE OXIDIZING LIQUID, TOXIC, N.O.S. (SODIUM CHLORATE, SODIUM NITRITE) 5.1(8.1) UN3099 PG II RO=D001 ERG 142 DRUM #45		--1	DM	--150 P	D001
i.	X	WASTE OXIDIZING SOLID, CORROSIVE, N.O.S. (TRICHLOROISOCYANURIC ACID) 5.1(8) UN3095 PG II ERG 140 DRUM #03		--1	DF	---8 P	D001
S. Additional Descriptions for Materials Listed Above 28A. L/C. 1X15GAL. 28B. S/I. 1X55GAL. 28C. S/I. 1X15GAL. 28D. S/I. 1X55GAL. 28E. L/I. R.C. 1X55GAL. 28F. L/I. R.C. 1X55GAL. DRUM #28. 28G. S/I. R. 1X30GAL. 28H. L/I. E. 1X55GAL. 28I. S/I. 1X55GAL.				T. Handling Codes for Wastes Listed Above			
32. Special Handling Instructions and Additional Information							
33. Transporter Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Date Month Day Year	
34. Transporter Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Date Month Day Year	
35. Discrepancy Indication Space							



UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.	
		NJID042896680	83050	5 of 5		
23. Generator's Name ELAN CHEMICAL COMPANY 288 DOREMUS AVE. NEWARK, NJ 07105 973/344-8014				L. State Manifest Document Number NJIA5283050		
24. Transporter Company Name				M. State Generator's ID		
25. US EPA ID Number				N. State Transporter's ID		
26. Transporter Company Name				O. Transporter's Phone		
27. US EPA ID Number				P. State Transporter's ID		
				Q. Transporter's Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers	30. Total Quantity	31. Unit Wt/Vol
				No.	Type	R. Waste No.
a.	X	WASTE OXIDIZING SOLID, CORROSIVE, N.O.S. ((CHROMIUM(VI)OXIDE, CHROMIUM TRIOXIDE) 5.1(8) UN3085 PG II ERG 140 DRUM #18	--1	DF	--25	P D001
b.	X	WASTE ORGANIC PEROXIDE TYPE C, LIQUID (DI-TERT-BUTYL PEROXIDE, T-BUTYL PEROXYBENZOATE 5.2(8) UN3103 PG II ERG 148 DRUM #18	--1	DM	--125	P D001
c.	X	WASTE TOXIC LIQUID, FLAMMABLE, ORGANIC, N.O.S. (CROTONALDEHYDE, EPICHLOROHYDRIN) 6.1(3) UN2020 PG I ERG 131 DRUM #12	--1	DF	--10	P U041
d.	X	WASTE TOXIC LIQUID, CORROSIVE, ORGANIC, N.O.S. (PHENOL, P-CRESOL) 6.1(8) UN2027 PG II ERG 154 DRUM #24	--1	DM	--100	P U188
e.	X	WASTE COPPER CYANIDE 6.1, UN1587 PG II ERG 151 DRUM #35	--1	CF	---5	P P029
f.	X	WASTE SODIUM CYANIDE, SOLID 6.1, UN1089 PG I ERG 157 DRUM #36, 37	--2	CF	---10	P P108
g.	X	WASTE POTASSIUM CYANIDE, SOLID 6.1, UN1080 PG I ERG 157 DRUM #38	--1	CF	---5	P P098
h.	X	WASTE TOXIC SOLID, INORGANIC, N.O.S. (CHROMIC HYDROXIDE, CHROMIUM CHLORIDE) 6.1 UN3288 PG II ERG 151 DRUM #15	--1	DF	---40	P D007
i.						
S. Additional Descriptions for Materials Listed Above 28A. S/L, E. 1X15GAL. 28B. L/L, C. 1X55GAL. 28C. L/L, T. 1X55GAL. 28D. L/C, T, E. 1X55GAL. 28E. S/R, H. 1X1GAL. 28F. S/R, H. 2X1GAL. 28G. S/R, H. 1X1GAL. 28H. S/E. 1X15GAL.				T. Handling Codes for Wastes Listed Above		
32. Special Handling Instructions and Additional Information 28E, 28F, 28G: DOT-E9106.						
33. Transporter Acknowledgement of Receipt of Materials						Date
Printed/Typed Name				Signature		Month Day Year
34. Transporter Acknowledgement of Receipt of Materials						Date
Printed/Typed Name				Signature		Month Day Year
35. Discrepancy Indication Space						

Ben Armenti

From: "Fred Schreiber" <fschreib_elan@yahoo.com>
To: <ben@elan-chemical.com>
Sent: Friday, May 05, 2006 12:59 PM
Subject: addendum to ethylene oxide email

I destroyed the ethylene oxide contents of four lecture bottles by bubbling the gas into a solution of water, ethanol and HCl. This hydrolyzed the ethylene oxide to ethylene glycol. I removed the heads of the four cylinders afterwards.

Fred

LECTURE BOTTLE <0.5-1bs.

*Fred G. Schreiber, PhD
Elan Chemicals, Incorporated
268 Doremus Avenue
Newark, New Jersey 07105
tel: 1-973-344-8014 x 114
fax: 1-973-344-1948*

Love cheap thrills? Enjoy PC-to-Phone calls to 30+ countries for just 2¢/min with Yahoo! Messenger with Voice.

5/5/2006

RESPONSE TO ALLEGED NOV_s
& IRL_s

ATTACHMENT 11

Records of the Quantity and Type of Hazardous
Waste Generated For 2003, 2004, 2005, and to
date 2006

Elan Chemical Company, Inc.
Newark, NJ

HAZARDOUS WASTE MANIFESTS - 2003

Date	Manifest No.	TSDF	Qty (Gal)	Waste No.	Mailed	Mailed
					Gen. St.	Disp. St.
3/3/2003	NJA2888024	Giant RR-A	4949	F003 F005	yes	no
3/10/2003	NJA2888025	Giant RR-A	4545	F003 F005	yes	no
4/7/2003	NJA4108583	Giant RR-A	5061	F003 F005	yes	no
5/12/2003	NJA4108577	Giant RR-A	5539	F003 F005	yes	no
7/16/2003	NJA4108578	Giant RR-A	4953	F003 F005	yes	no
9/29/2003	nja4108579	Giant RR-A	4996	F003 F005	yes	no
10/22/2003	nja4108580	Giant RR-A	5184	F003 F005	yes	no
12/3/2003	nja4108581	Giant RR-A	5076	F003 F005	yes	no
12/22/2003	nja4148814	Giant RR-A	5141	F003 F005	yes	no

2003	TOTAL	45,444
------	-------	--------

HAZARDOUS WASTE MANIFESTS - 2004

Date	Manifest No.	TSDF	Qty (Gal)	Waste No.	Mailed	Mailed	\$
					Gen. St.	Disp. St.	
02/12/04	nja4148820	Giant RR-A	5472	F003 F005	yes	no	\$4,095
03/05/04	nja4148886	Giant RR-C	5483	F003 F005	yes	no	\$2,569
03/29/04	nja4148815	giant rr-a	5000	F003 F005	yes	no	\$2,389
04/13/04	NJA4148817	giant rr-a	5371	F003 F005	yes	no	\$2,488
04/21/04	nja4148818	giant rr-a	5125	F003 F005	yes	no	\$2,466
05/11/04	nja4148819	giant rr-a	5621	F003 F005	yes	no	\$2,800
06/02/04	nja4148890	giantrr-a	5127	F003 F005	yes	no	\$4,182
06/28/04	nja4108582	giantrr-a	4438	F003 F005	yes	no	\$2,769
06/30/04	nja4148653	giantrr-a	5308	F003 F005	yes	no	\$2,461
07/02/04	nja4126902	giantrr-a	4940	F003 F005	yes	no	\$2,325
07/08/04	NJA4126901	giantrr-a	5059	F003 F005	yes	no	\$2,857
07/13/04	nja4126905	giantrr-a	5226	F003 F005	yes	no	\$2,539
07/19/04	nja4126906	giantrr-a	5320	F003 F005	yes	no	\$2,487
07/26/04	nja4126907	giantrr-a	5011	F003 F005	yes	no	\$2,330
08/02/04	nja4126908	giantrr-a	5473	F003 F005	yes	no	\$2,533
08/09/04	NJA4126909	giantrr-a	4946	F003 F005	yes	no	\$2,820
08/18/04	nja4126903	giantrr-a	5024	F003 F005	yes	no	\$2,378
08/24/04	nja4126904	giantrr-a	4866	F003 F005	yes	no	\$2,266
08/30/04	nja4148911	giantrr-a	5431	F003 F005	yes	no	\$2,557
09/02/04	nja4148912	giantrr-a	5488	F003 F005	yes	no	\$2,540
09/08/04	nja4148913	giantrr-a	5228	F003 F005	yes	no	\$3,242
09/23/04	nja4148914	giantrr-a	5100	F003 F005	yes	no	\$3,032
10/13/04	nja4148915	giantrr-a	5507	F003 F005	yes	no	\$2,548
11/10/04	nja4148916	giantrr-a	4935	F003 F005	yes	no	\$2,403
12/02/04	nja4148917	giantrr-a	4765	F003 F005	yes	no	\$2,368

2004	TOTAL	129,264
-------------	--------------	----------------

\$67,443

HAZARDOUS WASTE MANIFESTS - 2005

Date	Manifest No.	TSDf	Qty (Gal)	Waste No.	Mailed	Mailed
					Gen. St.	Disp. St.
02/02/05	nja4148918	giantrr-a	5100	F003 F005	yes	no
03/10/05	nja4148919	giantrr-a	5309	F003 F005	yes	no
03/28/05	nja4148920	giantrr-a	5327	F003 F005	yes	no
05/04/05	NJA5116727	Marisol	5129	F003	yes	no
05/11/05	nja4148921	giantrr-a	5091	F003 F005	yes	no
05/27/05	nja5116911	Marisol	5965	f003	yes	no
07/21/05	nja414922	giantrr-a	4823	F003 F005	yes	no
09/12/05	nja4126924	giantrr-a	4784	F003 F005	yes	no
09/16/05	nja5115277	Marisol	5579	f003	yes	no
10/24/05	nja4126925	giantrr-a	5481	f003	yes	no
11/28/05	nja5278663	Marisol	6072	f003	yes	no

2005	TOTAL	58,660
------	-------	--------

HAZARDOUS WASTE MANIFESTS - 2006

Date	Manifest No.	TSDF	Qty (Gal)	Waste No.	Mailed	Mailed
					Gen. St.	Disp. St.
2/24/06	nja4126926	OLDOVER-C	4866	f003-f005	yes	no
4/20/06	nja5283050	marisol	264		yes	no
4/26/06	nja5280230	marisol	4965	f003-f005	yes	no
5/4/06	nja5283071	marisol	20		yes	
6/20/06	NJA4126927	OLDOVER-C	5000	f003-f005	yes	no

2006	TOTAL	15,115
------	-------	--------

RESPONSE TO ALLEGED NOV_s
& IRLs

ATTACHMENT 12

Records of Fluorescent Tubes Purchased in the
last Five Years

Elan Chemical Company, Inc.
Newark, NJ

Alto[®]
Lamp Technology

*High Performance, Long Life,
Environmentally-Responsible Lamps*

Quality Industrial Products

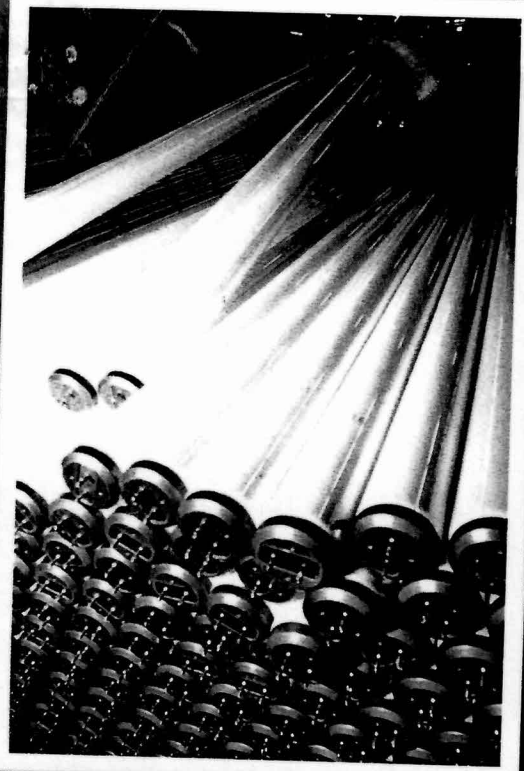
KEER Electrical Supply Co.

287 Mt. Pleasant Avenue
PO Box 9409

Newark, N.J. 07104

(973) 484-7400 FAX (973) 484-0805

PHILIPS



The Right Intent

From the beginning, Philips Lighting Company set out to make a fluorescent lamp with just the right amount of mercury to ensure peak performance. As soon as the U.S. Environmental Protection Agency (EPA) established the TCLP* test in 1990, Philips invested millions of dollars and launched a worldwide R&D effort to develop a technology that surpassed the standard.

This goal, achieved in 1995, offered the industry new possibilities. Now retail, commercial and industrial users could capitalize on cost-effective, high quality lighting that was kinder to our planet with no loss in lamp performance. By inventing the first fluorescent lamp to pass the EPA's TCLP, Philips instituted a whole new category of low-mercury fluorescent lamps, heightened corporate environmental awareness and eliminated more than NINE TONS of mercury at its source.

Superior Lighting Quality and Peak Performance

With approximately half a billion lamps in operation, Philips ALTO® fluorescent lamps:

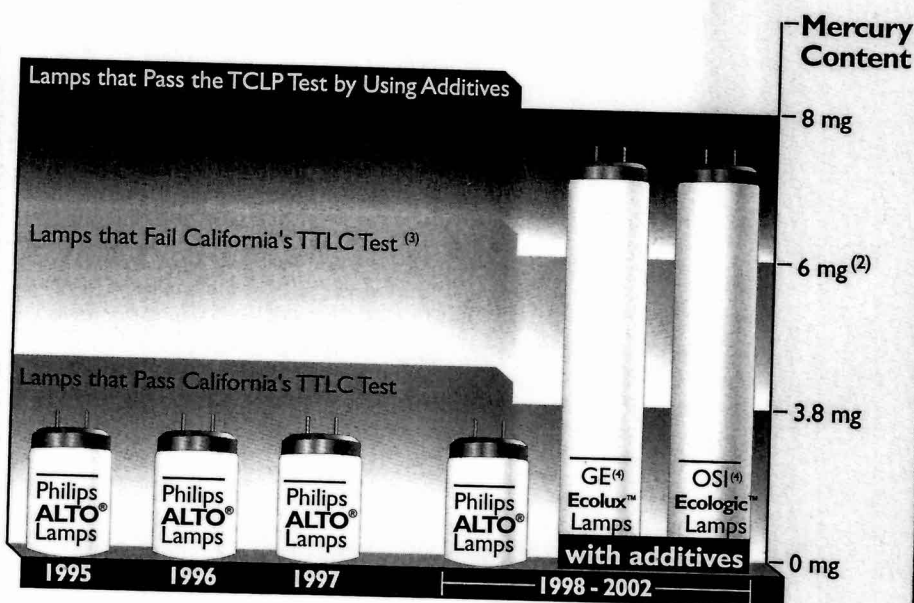
- ▶ Have a seven-year track record of proven high performance (long life, excellent light output, outstanding lumen maintenance)
- ▶ Are fully compliant with EPA and California tests without additives (see page 4)
- ▶ Offer the industry's broadest selection of TCLP-compliant* linear fluorescent lamps
- ▶ Reduce energy, maintenance and disposal costs
- ▶ Open end-of-life disposal options (in most states)
- ▶ Are true to the spirit of the law, which is to use less mercury rather than simply pass the test*

The Lowest Mercury Content

All fluorescent lamps contain mercury for effective operation, however, Philips lamps with ALTO Lamp Technology average 70% less mercury than the 2001 industry average for fluorescent lamps up to sixty inches in length which are not TCLP-compliant. By establishing a low-mercury product category that influenced other manufacturers to reduce the mercury content in their products and users to request greener lighting options, a new environmental milestone was reached.

Above Left: As international leader in lighting technology, Philips Lighting Company's plant in Salina, Kansas, is the largest fluorescent facility in the world. It was the first fluorescent manufacturing operation to achieve ISO 9000 certification, and also has been recently certified to ISO 14000.

Philips ALTO® T8 vs. Competitive Lamps Low-Mercury TCLP⁽¹⁾ Compliant Lamps (4 Ft. T8 Fluorescent Comparison)



Lamps over 6 mg of mercury fail the TCLP test without an additive.

Lamps over 3.8 mg of mercury fail the California TTLC test.⁽³⁾

Lamps below 3.8 mg of mercury pass the California TTLC test.

(1) The U.S. EPA test, Toxicity Characteristic Leaching Procedure. Consult local laws and regulations which may vary. Philips Lighting Company encourages recycling of all fluorescent lamps.

(2) There is a range of mercury dosage between 4 and 6 mg of mercury within which lamps may fail the TCLP test without using an additive (the range of 4 to 6 mg's of mercury represents variations in lamp chemistry and design).

(3) California state tests were conducted by independent laboratories on ALTO T8 lamps. The California TTLC (Total Threshold Limit Concentration) test for mercury is 20 PPM (20 PPM in a 190 GR T8 lamp equals 3.8 MG). A waste above 20 PPM is classified as hazardous by the state of California. No additives will help to pass this test.

(4) Comparison as of February, 2002.

Longer life means lower maintenance costs: As we go to print, this life test has been in progress for 17,057 hours without a single lamp failure. The result is even more remarkable because the test, which divides the lamps evenly between instant start and programmed start ballasts, features pre-Universal ALTO T8 lamps (see page 8), which have an average rated life of only 15,000 hours on instant start ballasts. Despite this, 100% of all lamps on both ballast types are still going strong at 17,057 hours.

Environmental Mission

Environmental responsibility is at the core of everything we do. From inventing the first compact fluorescent lamp in 1980 that cut greenhouse gases from electric power generation 75% compared to standard incandescent lamps, to decreasing mercury content with ALTO® Lamp Technology in 1995, reducing pollution at its source has always been our primary goal. Philips ALTO lamps also:

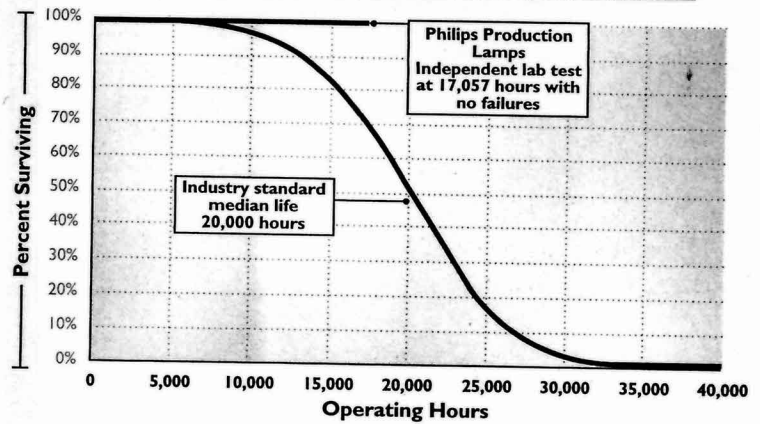
- ▶ Conserve energy: energy-efficient Philips ALTO lamps reduce the emission of greenhouse gases from electric power generation
- ▶ Reduce waste: long-lasting ALTO lamps decrease the amount of total waste generated over time

In recognition of our comprehensive environmental commitment, Philips Lighting Company has been named 2002 Energy Star® Partner of the Year by the U. S. Environmental Protection Agency (EPA) and the Department of Energy (DOE) for "making and promoting energy-efficient products that save money on energy bills and reduce greenhouse gas emissions."

Industry Recognition

ALTO Lamp Technology has won awards from many organizations including the EPA Green Lights Program; the National Association of Independent Lighting Distributors; the National Retail Hardware Association/Home Center Institute; the North American Hazardous Materials Management Association; TED, the industry publication for NAED; Popular Science Magazine; and Plant Services MRO MarketPlace.

T8 PHILIPS ALTO Fluorescent Lamps Mortality Curve—Weibull



Life testing ONGOING at INTERTEK TESTING SERVICES
certified to ISO 9001, using IES LM40 approved life testing methods

Rev.6 updated August 1, 2002



Philips Lighting Company's
commitment to sustainability
is evident by our support of
the following agencies...





The Problem with Mercury

Although mercury is essential for fluorescent lamp operation, it is a volatile metal that can pass into the atmosphere during waste combustion and leach into the ground from municipal landfills, contaminating water, fish and food supplies.

Currently 41 states have issued advisories concerning mercury levels in fish recovered from their lakes and streams. These advisories limit, or ban altogether, fish consumption from these waters.

Mercury Testing

Two methods are used today to classify spent lamps as hazardous or non-hazardous waste:

The EPA's Toxicity Characteristic Leaching Procedure (TCLP) test was developed in 1990 to simulate how waste might react in a non-hazardous municipal landfill. Its purpose was to measure toxic substances that might dissolve into the ecosystem. In this procedure, lamp components are disassembled, separated, crushed and sealed in a laboratory beaker. Next, they are agitated in acid for 18 hours and then filtered. The filtered solution is then measured for mercury content. If the measurement is 0.2 mg of mercury per liter or less, it passes the TCLP.

California's Total Threshold Limit Concentration (TTLC) is based on the simple concentration of mercury in a lamp. With a TTLC mercury limit of 20 parts per million (a maximum of 3.8 mg in a 4-foot T8 lamp), a lamp that passes the TTLC will almost certainly pass the TCLP. But, as you can see below, it doesn't always work in reverse.

The Additive Issue

Competitive "low-mercury" lamps, containing more than twice as much mercury as Philips ALTO lamps, use special additives to influence the TCLP. By including chemicals that reduce soluble mercury during the TCLP's agitation and filtering process, the higher-mercury lamps manage a passing grade. This tactic, however, does not work for California's more stringent TTLC.

And what happens during the actual transport and disposal of lamps in a real-life landfill? Without intentional manipulation, the mercury and additives may never combine as they do in the TCLP. So we all have to wonder, what ultimately happens to the environment?

The Universal Waste Rule (UWR)

The UWR mandates that lamps which fail the TCLP must be treated as hazardous waste or recycled at the end of life. Although all lamp types are included, fluorescent and high intensity discharge are the most affected. This rule, which was finally adopted in July, 1999, with the active support of Philips Lighting Company, went into effect in January, 2000, simplifying handling and record keeping. States such as California may choose to adopt stricter regulations.

The Choice is Yours

Choose high-performance, low-mercury, TCLP-compliant lamps, such as ALTO® that will help preserve our planet for future generations, and either recycle or dispose of them conventionally (state permitting) at the end of life. Or use non-TCLP-compliant lamps and either recycle or dispose of them as hazardous waste and incur all the extra hassle and expense of tracking, transport and administrative burdens.

The Philips Family of ALTO® Lamps

In keeping with our environmental commitment, Philips Lighting Company has incorporated ALTO Lamp Technology into the manufacturing processes of a growing range of environmentally-responsible lamp types. To date, 90 percent of our linear fluorescent line, offering the industry's broadest selection, features this proven technology. In addition, ALTO PL-T and PL-C compact fluorescent, ALTO high pressure sodium, ALTO MasterColor® metal halide and ALTO MasterLine® halogen lamps have been added to the ALTO lamp family.

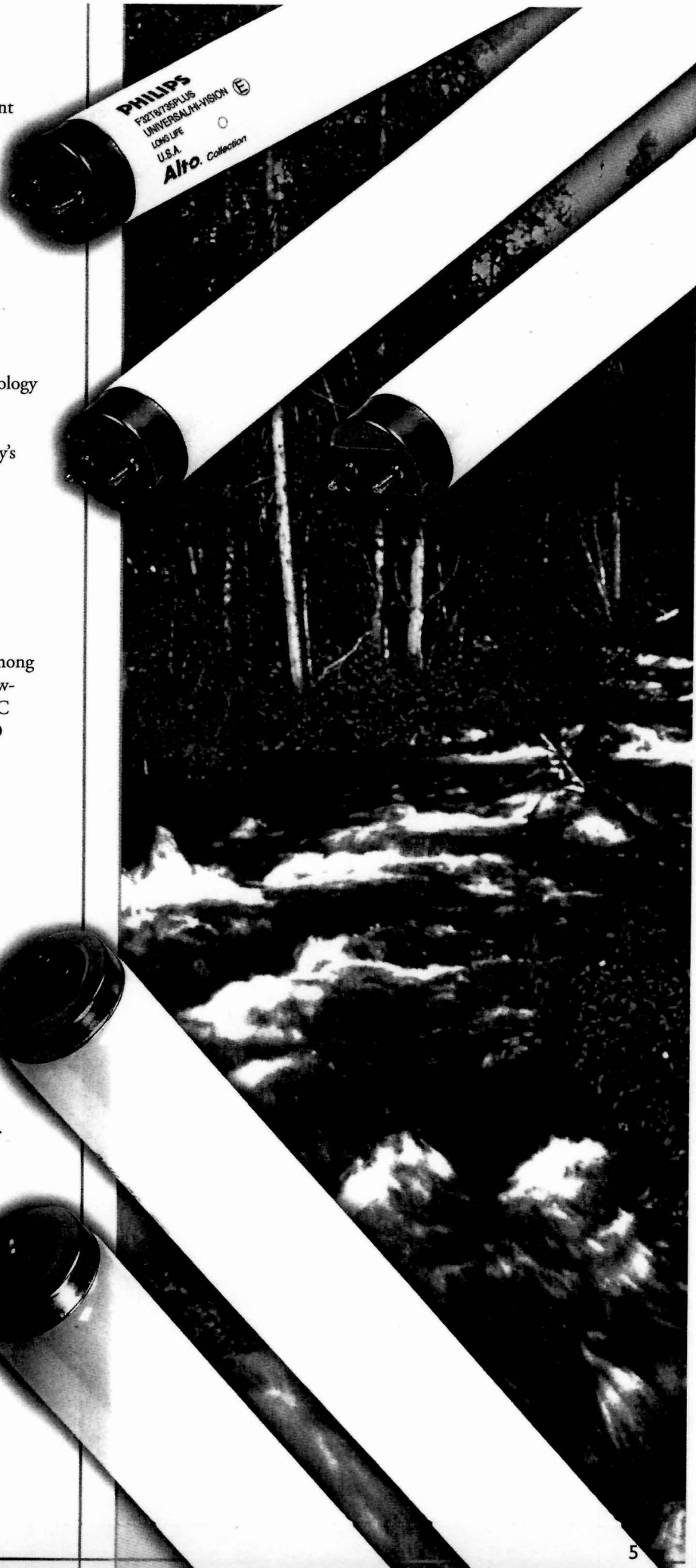
ALTO® Linear Fluorescent Lamps

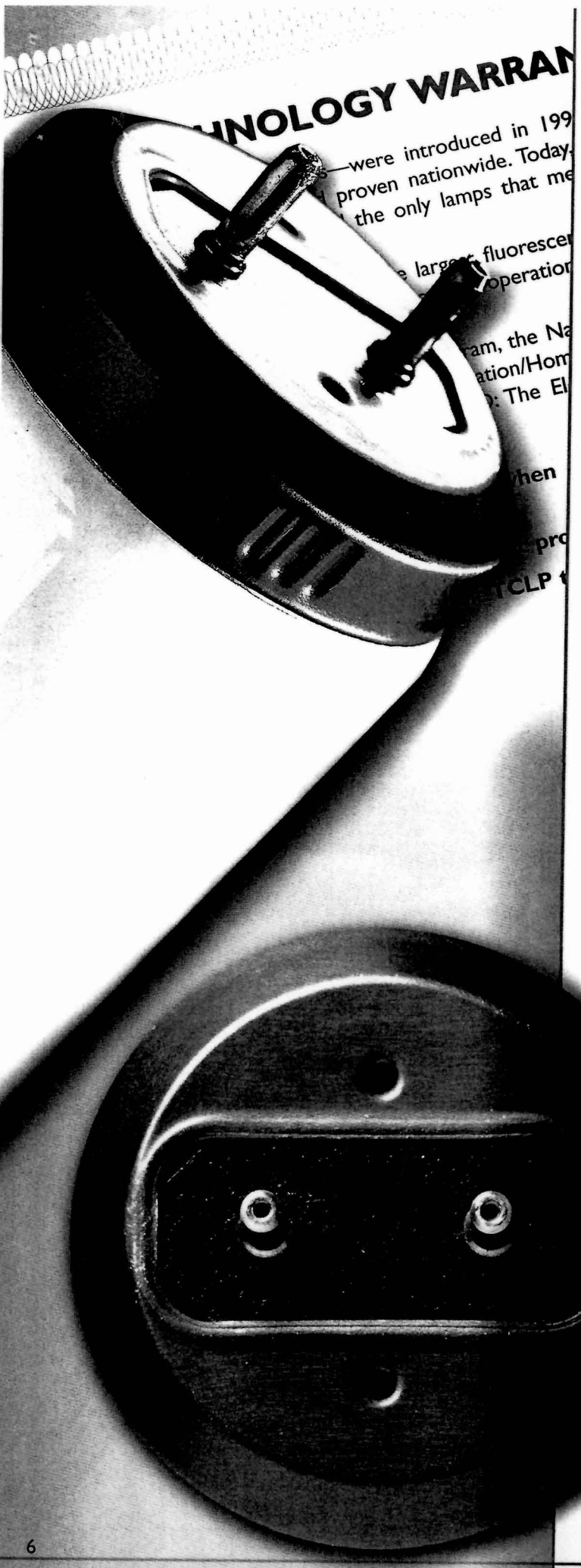
You're sure to find the right lamp for your application among the industry's widest assortment of high-performance, low-mercury fluorescent lamps that pass the TCLP and TTLC tests with no loss in lamp life or light output. The ALTO fluorescent family includes:

- ▶ ALTO T8 and T12 lamps
- ▶ ALTO Universal T8 lamps
- ▶ ALTO PLUS long-life lamps
- ▶ ALTO Advantage ultimate-performance, Long Life T8 and T12 lamps
- ▶ ALTO Energy Advantage maximum energy-saving T8 lamps

Innovative Technology Ensures Peak Performance

Innovative technology enables Philips' high-performing ALTO fluorescent lamp collection to maintain longer life and higher light output compared to standard fluorescents. Capsule dosing dispenses a minute but precise dose of mercury to ensure optimum performance (life, lumens and color).





TECHNOLOGY WARRANTY

were introduced in 199...
proven nationwide. Today,
the only lamps that me...

...the largest fluorescer
...operation

...ram, the Na
...ation/Hom
...: The El

...when

...pro

...TCLP

Benefits of Philips ALTO® Fluorescent Lamps

Reduced Cost of Ownership

Savings on energy, disposal (state permitting) and maintenance make environmental responsibility a smart business decision.

No Extra Cost

Why should you pay more for doing the right thing? Philips puts no premium on ALTO fluorescent lamps so they're comparable in price to competitive non-TCLP-compliant lamps.

Long Life

The proven track record of ALTO Lamp Technology explains why half a billion ALTO fluorescent lamps meet or surpass standard rated life.

High Color Rendering and Peak Lumen Maintenance

Philips' exclusive HI-VISION® Phosphor coating increases the already high color rendering indices to 78 CRI in TL 70 and 86 CRI in TL 80 lamps, and delivers a lumen maintenance of 95 percent. Also, Cathode Guard Construction enhances lumen maintenance and reduces end blackening.

Full Rated Life on all T8 Ballast Types

Philips ALTO Universal 4-foot 32-watt T8 Fluorescent lamps are the only T8 lamps that deliver full rated life on all ballast types for maximum lighting quality and maintained light output. Our entire F32T8 Standard, PLUS and Advantage lines have been converted to Universal operation. That's a 33 percent increase—from a 15,000 to 20,000-hour average rated life in standard lamps, and an 18,000 to 24,000-hour average rated life in PLUS and Advantage lamps—on instant start ballasts!

Out-of-The-Box 2-Year T8 Warranty

All ALTO T8 lamps operating on approved manufacturers' ballasts are guaranteed for two years based on a three-hour start, longer for PLUS and Advantage lamps. Warranty includes life and TCLP compliance and Philips Lighting will match all competitive warranties and may extend some warranties for specific installations.

Open End-of-Life Disposal Options

Most states allow users of TCLP-compliant lamps to choose between recycling or conventional disposal with reduced tracking, transport and administrative lamp recycling burdens. Go to www.lamprecycle.org for a complete list of state disposal regulations.

Green End Caps® for Easy ID

Eye-catching Green End Caps make maintenance easier through stand-out identification at installation and end of life.

Meeting or Surpassing Customer Standards

In April 2000, Philips audited four early ALTO fluorescent lamp installations to check ALTO's real-world performance. Like the current mortality test underway at Intertek Testing Services, Philips found that the lamps not only met customer standards but in many cases, surpassed them.

Performance Case Studies

Safeway (Arizona)

Safeway supermarkets in Arizona have been working with Amtech Lighting Services for over ten years. Nine years ago they implemented an electronic retrofit that achieved substantial energy savings. When the original ALTO low-mercury T8 fluorescent lamps became available, Safeway gradually switched the Arizona stores to the new lamps in their low-ceiling 2' x 4' fixtures over the course of their regular 24-month wash and relamp maintenance cycles. At that time, Philips ALTO low-mercury fluorescent lamps were the only fluorescent lamps on the market that passed the Environmental Protection Agency's TCLP.

But Safeway wanted to go one better. In 1999, it wanted to cut maintenance costs and brighten its stores. With Safeway's dual corporate goals of continuous store improvement and ongoing cost containment, ALTO PLUS T8 lamps provided an excellent solution. All ALTO T8 lamps feature HI-VISION® Phosphor, a proprietary coating that provides the highest CRI and lumen maintenance available.

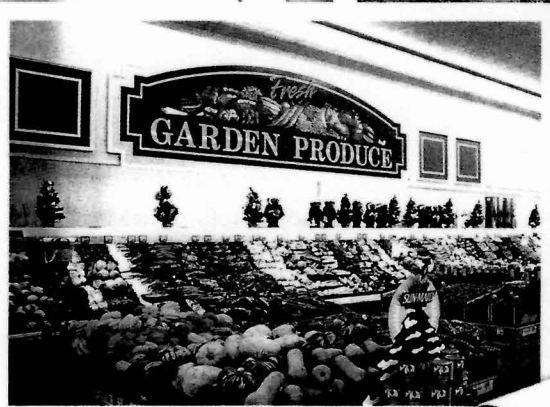
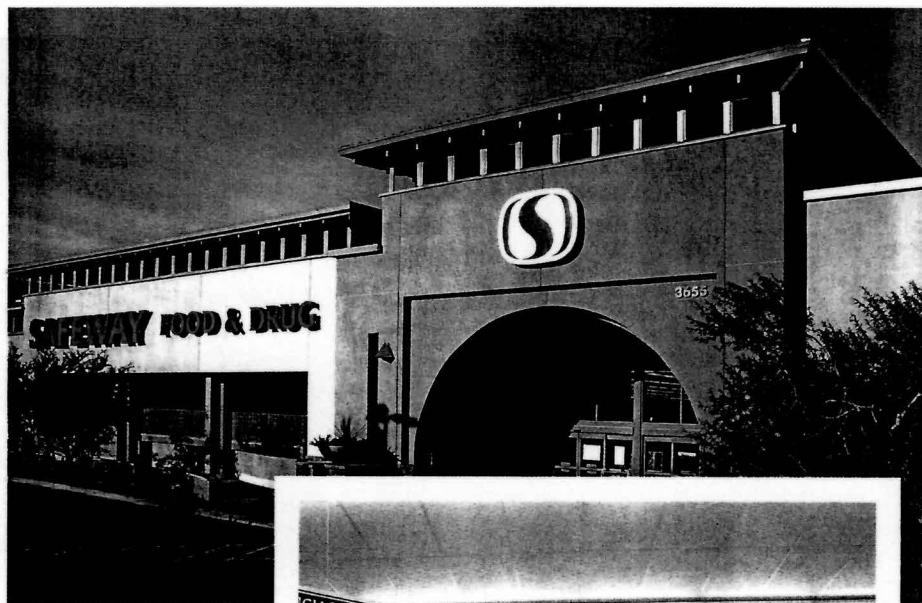
By switching from standard ALTO T8 TL 70 lamps to ALTO PLUS T8 TL 70 lamps, Safeway could move to a 30-month wash and relamp maintenance cycle while improving lighting quality. And by reconfiguring the remaining 2-lamp 8-foot T12 fixtures in the higher main ceiling (about 50% of the fixtures) to 6-lamp 4-foot T8 fixtures, Safeway could increase light output 21% using the same wattage.

Julius Koch USA, Inc., Bedford, MA Manufacturer of custom-dyed window covering products

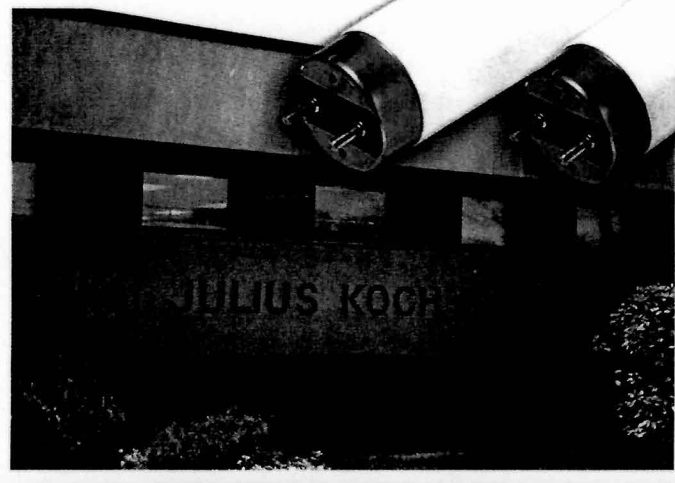
- ▶ Installed 2000 F32T8/TL841 lamps in July, 1997
- ▶ Burning cycle 24 hours per day which converts to over 22,848 hours
- ▶ 99% of lamps still operating as of April, 2000

"Relamping with Philips ALTO fluorescents now makes our lighting maintenance much simpler. Not only are we certain we comply with the stringent environmental regulations, but we are also enjoying the benefit of superior lamp performance, including the critical color rendition needed to produce our products, as well as long lamp life."

George Gracia,
Maintenance Manager



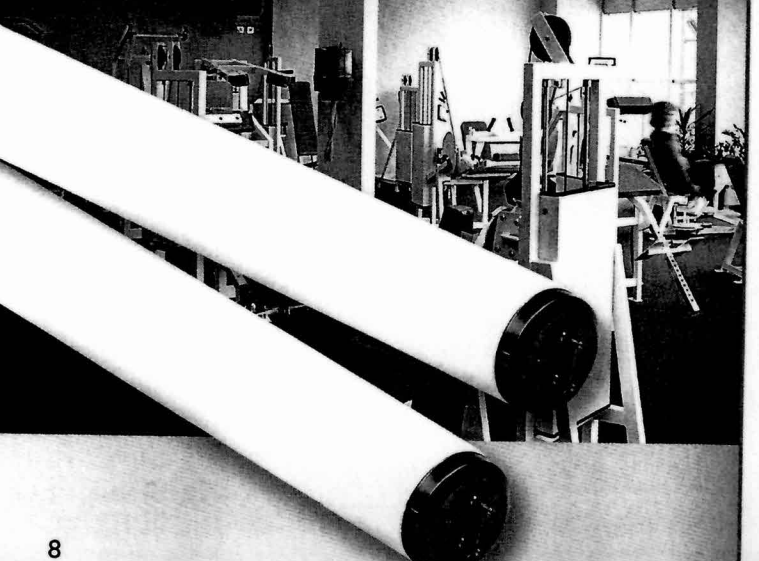
Photography by Mark Delasso of Vixus, Ltd.



T8 Linear Fluorescents



T12 Linear Fluorescents



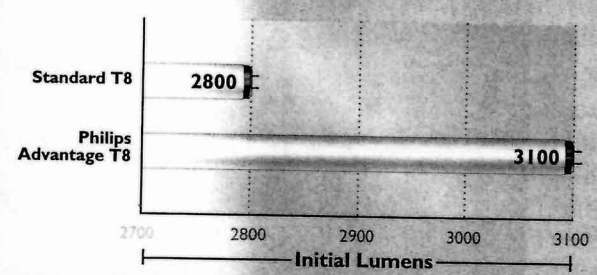
ALTO® T8 Performance Options

Lowest-mercury, TCLP-compliant T8 lamps are priced competitively and provide superior value over non-compliant lamps. Available in all popular lamp types and enhanced with HI-VISION® Phosphor coatings, four multi-benefit ALTO T8 performance options make them the energy-efficient lamps of choice for commercial and industrial applications:

- ▶ **Standard Universal T8:** Great-performing competitive 20,000-hour lamps in TL 70 (78 CRI) and TL 80 (86 CRI) versions with full-rated life on all ballast types.
- ▶ **PLUS T8:** TL 70 and TL 80 types offering 20% longer life (24,000 hours). This saves on maintenance and provides the most cost-effective lighting solution. Also features full-rated life on all ballast types.
- ▶ **Advantage T8:** Ultimate-performance TL 80 lamps offering 20% longer life (24,000-hours), 86 CRI and 10% higher lumens (3100 initial lumens). With reduced-output electronic ballasts, ALTO Advantage lamps save energy compared to standard lighting systems. With high-output electronic ballasts, a two-lamp ALTO Advantage system can replace a conventional three-lamp system, reducing energy consumption, fixture costs and fixture size. Also features full-rated life on all ballast types.

▶ **Energy Advantage T8:** High-efficacy (97 LPW), energy-saving 30-watt instant-start lamps feature an 86 CRI, the highest color rendition in an energy-saving T8 lamp. Gain an instant 2-watt per lamp savings on any installed T8 Instant Start ballasts just by replacing the current lamp with the Energy Advantage T8.

T8 Lumen Output Comparison



ALTO® T12 Fluorescent Lamps

ALTO high-performance, long life T12 lamps include all popular versions, as well as a selection of shorter and longer-length lamps. ALTO lowest-mercury, TCLP-compliant T12 lamps are priced competitively and provide superior value over non-compliant lamps. Choose from these three groups:

- ▶ **Econ-o-watt® Energy-saving T12:** 34-watt lamps in standard grade, as well as SPEC (70+ CRI) and Ultralume (85 CRI) types
- ▶ **Standard T12:** full-output 40-watt lamps in SPEC and Ultralume types
- ▶ **Advantage T12:** Ultimate-performance lamps offering 20 percent longer life (24,000 hours) with 85 CRI and the highest lumen output (3600 initial lumens) of any 40-watt four-foot T12 lamp available

ALTO PL Compact Fluorescent Lamps

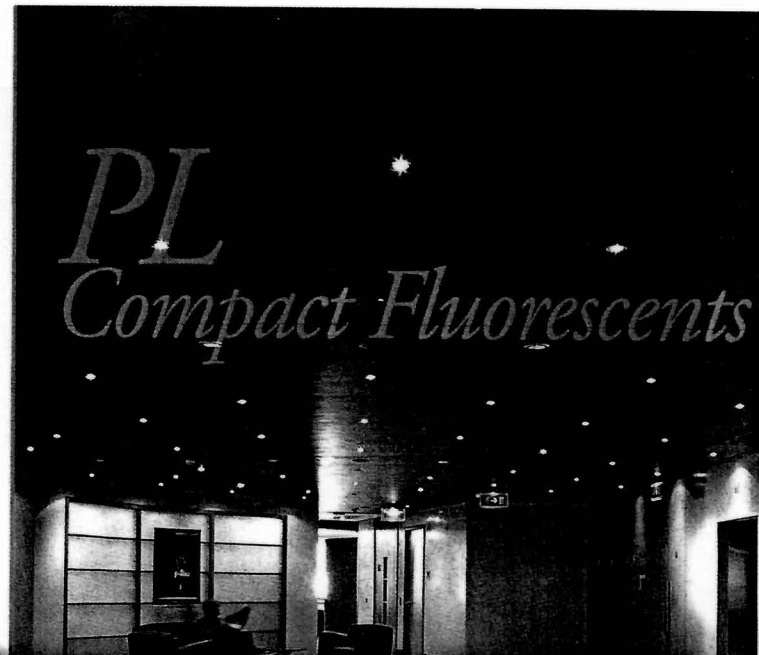
High-efficacy, versatile and compact ALTO PL-T and PL-C lamps come in a broad range of wattages, lumen packages, color temperatures (2700, 3000, 3500K and 4100K) and dimmable versions offering design flexibility. With a high 82 CRI and a long 10,000-hour life, PL lamps offer marked energy and maintenance savings over incandescent equivalents.

ALTO 4-Pin PL-T:

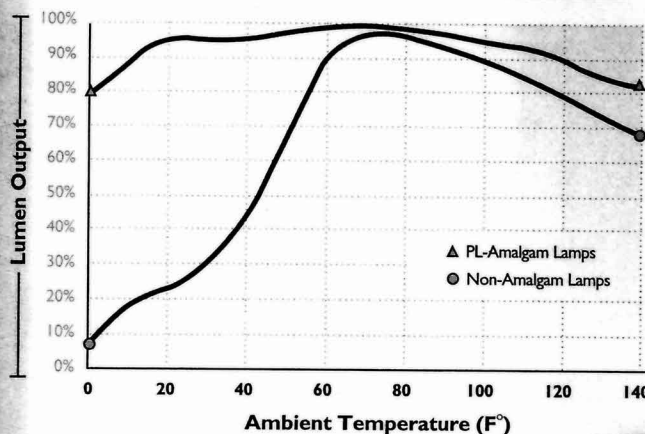
- ▶ Triple-Tube Configuration—The most energy-efficient (75 LPW), ultra compact, high-quality solution for recessed downlights
- ▶ Versatility—Also widely used in pendants, sconces, wall washers, outdoor bollards and utility fixtures
- ▶ Many Options—Available in 18, 26, 32, and 42-watt versions (1200 to 3200 initial lumens) and four color temperatures
- ▶ Dimmable—Can be dimmed for extra flexibility and energy savings when used with electronic dimming ballasts
- ▶ Superior thermal performance—Amalgam technology, which maintains PL-T's light output over a wide temperature range, improves performance in downlights, enclosed fixtures and outdoor applications.

ALTO 4-Pin and 2-Pin PL-C:

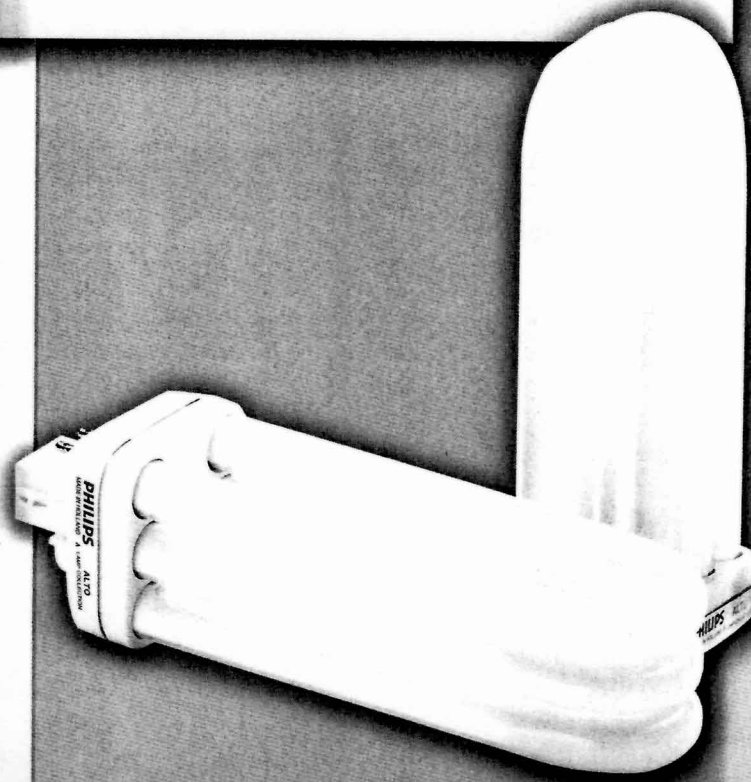
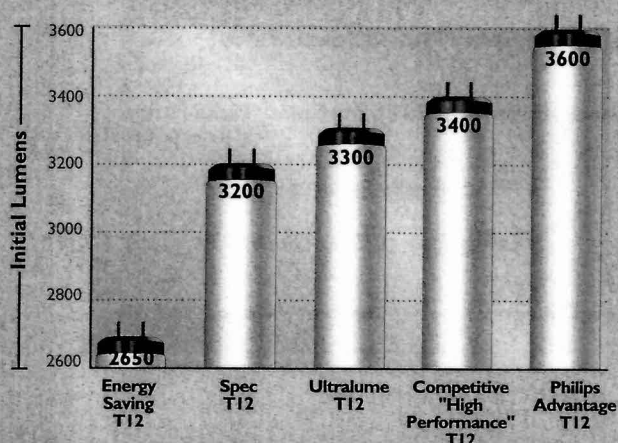
- ▶ Quad-Tube Cluster Configuration—Energy-efficient compact design for use in downlights and wall washers in general lighting; decorative wall sconces, linear cove and valence lighting and vandal-resistant surface-mount luminaries.
- ▶ Many Options—Available in 13, 18 and 26-watt versions (860 to 1800 initial lumens) and four color temperatures; 2-Pin versions for preheat electromagnetic ballast operation; 4-Pin versions for rapid start electronic ballast or dimming ballast operation
- ▶ Dimmable—In 4-Pin versions when used with electronic dimming ballasts for extra flexibility and energy savings
- ▶ Enhanced Performance—More light output in high-temperature applications and improved lumen maintenance

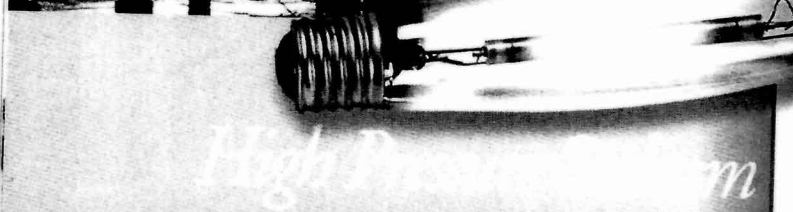


Lumen Output vs Ambient Temperature



Lumen Output Comparison





Photography by Gary Gordon, LLC, Club Monaco

ALTO® High Pressure Sodium Lamps

ALTO HPS is the ideal choice for industrial, security and exterior applications where long life, efficiency and maximum light output are more important than color quality. ALTO HPS benefits include:

- Reduced Maintenance Costs—Less frequent relamping due to 24,000-hour life
- Direct Retrofit—Easy to switch from non-TCLP-compliant types because ALTO HPS works on all standard HPS ballasts
- High Efficacy and Lumen Maintenance—High performance of up to 140 LPW with a 90 percent lumen maintenance
- TCLP-Compliant—Low and high-wattage lamps including 100, 150, 250, 400 and 2,000-watt HPS lamps pass the U. S. EPA's TCLP test.

ALTO® MasterColor® Metal Halide Lamps

Award-winning MasterColor® metal halide is the superior, energy-efficient, white light source for architectural, display, flood and exterior lighting. With outstanding color performance, increased light output and improved energy efficiency, it is the source of choice for a broad range of applications. And, as with all ALTO lamps, MasterColor ED-17 and PAR-38 lamps reduce mercury at its source and offer flexible disposal options. Features include:

- Superior Color Stability—Both warm (3000K) and cool (4000K) versions maintain color stability within $\pm 200K$ throughout rated life.
- Excellent Color Rendition—A CRI ranging from 85 to 96 improves color quality.
- Superior Light Output—With an efficacy of up to 93 LPW and a lumen maintenance of up to 92 percent, MasterColor produces more maintained light output than conventional metal halide sources.
- Application Versatility—A wide range of MasterColor PAR and ED-17 versions featuring ALTO Lamp Technology offer myriad options in general and accent lighting applications.

MASTERCOLOR® ENERGY-SAVING UPGRADES* (For Reduced Cost of Ownership)

Existing System: PAR-38 Standard Metal Halide
(20 fixtures)

New System: PAR-38 MasterColor® Metal Halide
(10 fixtures)

- Annual Energy Saving: \$516
- Energy Savings Over Life: \$1,290

*Accent Lighting application, 4,000 operating hours/year, 10¢ KWH

MasterColor® Metal Halide

MasterLine® Halogen PAR Lamps

MasterLine® halogen PAR-38 lamps meet the need for economical, flexible and fully-dimmable accent lighting. And, like other ALTO lamps, they meet TCLP standards and are classified as non-hazardous waste. MasterLine PAR-38 lamps are:

- ▶ Completely Flexible—No ballast or transformer is required in the fixture, lowering cost. MasterLine lamps can usually be interchanged in a fixture (size and thermal limitations permitting)
- ▶ Dimmable—MasterLine lamps may be easily and fully dimmed
- ▶ Superior Optics—DiOptic™ reflector technology concentrates and blends the light for intense, smooth beam patterns.

A Smart Business Decision

With the industry's lowest mercury content in a lamp and a time-proven track record of peak performance, reduced operating costs, and no extra cost at purchase, Philips ALTO lamps make it easy to do the right thing for the environment as well as your bottom line.

Call Your Philips Sales Representative or 1-800-555-0050 for more information.



MasterLine®
Halogen



Philips Lighting Company
200 Franklin Square Drive • P.O. Box 6800
Somerset, NJ 08875-6800
1-800-555-0050
www.lighting.philips.com/na

A Division of Philips Electronics North America Corporation
P-5256-C

Printed in USA 8/02

Philips Electronics Ltd.
281 Hillmount Road
Markham, Ontario
Canada L6C 2S3
1-800-555-0050
www.lighting.philips.com/na



Serving you since 1939



INVOICE

KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

INVOICE NUMBER

DATE

1283172-01

01/20/06

BILLELAN CHEMICAL CO INC
TO: 268 DOREMUS AVESHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

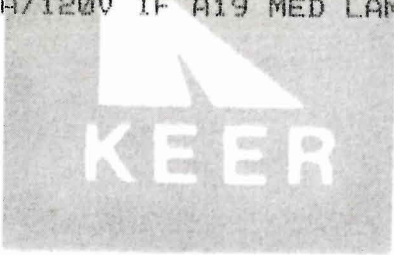
NEWARK

NJ 07105

NEWARK

NJ 07105

INVOICE NUMBER		SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P O NUMBER	SHIP DATE	PAGE NO		
1283172-01		130	01/18/06	4	45073	01/18/06	1		
SHIPPING INSTRUCTIONS							FRT.		
DELIVER OUR TRUCK							B		
QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
6		6	78590158760		PLEASE VISIT OUR WEBSITE www.keerelectric.com				
100		100	78621080413		SOD B-45.0 HTR ELEMENT	E	10.7700	64.62	2.00
15		15	04667725940		T-B RB14-10F 16-14 INS SPADE TERM	C	46.7000	46.70	2.00
					WLA F96T12/CW/EW 425MA FLUOR LAMP	n	2.8000	42.00	2.00
					258400				
48		48	04667737474		WLA 100A/120V IF A19 MED LAMP	E	0.3700	18.14	2.00
					374744				



THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- * - FED /OTHER TAX APPLICABLE
- * - STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN FREIGHT OUT

0.00 5.00

NET TERMS: INV 30 DUE: 02/19/06
YOU MAY DEDUCT A CASH DISCOUNT
OF \$3.43 IF PAID BY 01/30/06

ACCOUNTING COPY

SUB TOTAL 171.46

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL 5.00

FED /OTHER TAX

STATE TAX

PAYMENT REC'D

TOTAL AMOUNT DUE

176.46

INVOICE

K
KEER

KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

INVOICE NUMBER

DATE

1282884-01

01/23/06

BILLELAN CHEMICAL CO INC
TO: 268 DOREMUS AVESHIPELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO
1282884-01	130	01/09/06	4	45027	01/20/06	1

SHIPPING INSTRUCTIONS

FRT.

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

DELIVER OUR TRUCK

FAX344-1948

B

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD	SHIPPED							
					PLEASE VISIT OUR WEBSITE www.keerelectric.com				
1		1			*500 DU324RB	UT	312.1500	312.15	2.00
1		1			*500 SN20A 200AMP NEUTRAL	UT	81.9000	81.90	2.00
2		2	78358501520		HUB HBL9368 ANG PLUG NEMA6-50P 250V	E	42.7000	85.40	2.00
2		2	78358501542		HUB HBL9333 ANG PLUG 10-30P 125/250V	E	30.4000	60.80	2.00
2		2	78358501524		HUB HBL9331 ANG PLUG-NEMA6-30P 250V	E	40.9500	81.90	2.00
12		12	04667727484		WLA MH250/U ED28 CLEAR UNIV MTG 274845	E	16.8000	201.60	2.00
15		15	04667725840		WLA F96T12/CW/EW 425MA FLUOR LAMP 258400	E	2.8000	42.00	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED /OTHER TAX APPLICABLE
- STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

0.00

5.00

NET TERMS: INV 30 DUE: 02/22/06
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$17.32 IF PAID BY 02/02/06

ACCOUNTING COPY

SUB TOTAL

865.75

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

5.00

FED /OTHER TAX

STATE TAX

PAYMENT REC'D

TOTAL AMOUNT DUE

870.75



Serving you since 1939



INVOICE

KEER Electrical Supply Co.

INVOICE NUMBER

DATE

267 Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

1284947-01

03/29/06

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVESHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK NJ 07105

NEWARK NJ 07105

INVOICE NUMBER		SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P O NUMBER	SHIP DATE	PAGE NO	THIS INVOICE SUBJECT TO THE TERMS AND CONDITIONS GIVEN ON THE BACK OF THIS INVOICE.		
1284947-01		130	03/27/06	4	45420	03/27/06	1			
SHIPPING INSTRUCTIONS							FRT.			
DELIVER OUR TRUCK							0			
FAX344-1948										
QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%	
ORDERED	BACK ORD.	SHIPPED								
6		6	76838604579		PLEASE VISIT OUR WEBSITE					
4		4	76838604680		www.keerelectric.com					
200		200	78325030341		UNV 446-SLH-TCP-0001 2-40T12/RS BAL 12	E	15.7950	94.77	2.00	
15		15	04667725840		UNV 480-XLH-TCP-0001 2-96T12/HO120 BL	E	44.1450	176.58	2.00	
					IDI 30-341 341 WIRECON TAN 100/BX	M	134.0300	26.81	2.00	
					WLA F96T12/CW/EW 425MA FLUOR LAMP	E	2.8000	42.00	2.00	
					258400					
30		30	04667724470		WLA F34CW/RS/EW/ALTO RS FLUOR LAMP 30	E	1.3720	41.16	2.00	
					244707					

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

CODE EXPLANATION
 * - STATE TAX APPLICABLE
 # - FED /OTHER TAX APPLICABLE
 - - STATE & FEDERAL TAX APPL
 B - BALANCE BACK ORDERED
 C - CONSIDER COMPLETE
 D - DIRECT SHIPMENT
 F - FACTORY MINIMUM

FREIGHT IN FREIGHT OUT

0.00 5.00

NET TERMS: INV 30 DUE: 04/28/06

YOU MAY DEDUCT A CASH DISCOUNT
OF \$7.63 IF PAID BY 04/08/06

ACCOUNTING COPY

SUB TOTAL 301.32
 MISC. CHARGE
 TELE CHARGE
 FREIGHT TOTAL 5.00
 FED /OTHER TAX
 STATE TAX
 PAYMENT REC'D

TOTAL AMOUNT DUE

306.32


KEER Electrical Supply Co.**INVOICE**

INVOICE NUMBER

DATE

1276042-01

05/05/05

BILLELAN CHEMICAL CO INC

TO: 268 DOREMUS AVE

NEWARK

NJ 07105

SHIPELAN CHEMICAL CO INC

TO: 268 DOREMUS AVE

NEWARK

NJ 07105

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

INVOICE NUMBER	SLSMN.	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.
1276042-01	130	05/03/05	4	43643	05/03/05	1

SHIPPING INSTRUCTIONS

DELIVER OUR TRUCK

FAX344-1948

FRT.

B

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
1		0		B	PLEASE VISIT OUR WEBSITE AT www.keerelectric.com				
2		0		B	*SOD LH4N125LU7	UT	255.0500	0.00	2.00
12	12	0		B	*SOD LH4N106LU7	UT	180.7000	0.00	2.00
12	5	0	04667722009	B	*PHIL BC-EL/DT-15 381095	E	6.1000	0.00	2.00
4		0		B	*WLA SLS25 FLUOR LAMP SUB 4/100W LMP	E	15.7500	110.25	2.00
50		0		B	*SOD XACA009	UT	4.2000	0.00	2.00
		26	7844904097	B	MER M401 LATCH LATCH F/M401 LENS	EA	2.0000	52.00	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED./OTHER TAX APPLICABLE
- STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 06/04/05

YOU MAY DEDUCT A CASH DISCOUNT
OF \$3.25 IF PAID BY 05/15/05

ACCOUNTING COPY

SUB TOTAL

162.25

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED./OTHER TAX

STATE TAX

PAYMENT REC'D.

TOTAL AMOUNT DUE

162.25

INVOICE

K
KEER**KEER Electrical Supply Co.**

INVOICE NUMBER

DATE

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

1276040-02

05/16/05

BILLELAN CHEMICAL CO INC
TO: 268 DOREMUS AVESHIPELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO
1276040-02	130	05/03/05	4	43645	05/12/05	1

SHIPPING INSTRUCTIONS

DELIVER OUR TRUCK

FAX344-1948

FRT.

B

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
24		24			PLEASE VISIT OUR WEBSITE AT www.keerelectric.com				
					*PHIL BCS0TWISTLINE-BU10/FL LAMP	E	13.9600	335.04	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED / OTHER TAX APPLICABLE
- - STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 06/15/05
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$6.70 IF PAID BY 05/26/05

ACCOUNTING COPY

SUB TOTAL

335.04

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED / OTHER TAX

STATE TAX

PAYMENT REC'D.

TOTAL AMOUNT DUE

335.04



Serving you since 1939



INVOICE

KEER Electrical Supply Co.

INVOICE NUMBER

DATE

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

1276042-04

05/16/05

BILLELAN CHEMICAL CO INC
TO: 268 DOREMUS AVESHIPELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P O NUMBER	SHIP DATE	PAGE NO
1276042-04	130	05/03/05	4	43643	05/12/05	1

DELIVER OUR TRUCK

SHIPPING INSTRUCTIONS

FAX344-1948

FRT.

B

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

QUANTITY			EDP NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD	SHIPPED							
12		12			PLEASE VISIT OUR WEBSITE AT www.keerelectric.com				
12		5	04667722009		*PHIL BC-EL/DT-15 381095 WLA SLS25 FLUOR LAMP SUB 4/100W LMP	E E	6.1000 15.7500	73.20 78.75	2.00 2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED /OTHER TAX APPLICABLE
- - STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 06/15/05
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$3.04 IF PAID BY 05/26/05

ACCOUNTING COPY

SUB TOTAL

151.95

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED./OTHER TAX

STATE TAX

PAYMENT REC'D.

TOTAL AMOUNT DUE

151.95



Serving you since 1939



INVOICE

KEER Electrical Supply Co.

INVOICE NUMBER

DATE

1276860-01

06/08/05

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVESHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.
1276860-01	130	06/03/05	4	43859	06/06/05	1

DELIVER OUR TRUCK

SHIPPING INSTRUCTIONS
FAX 344-1948

FRT.

B

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
					PLEASE VISIT OUR WEBSITE AT www.keerelectric.com				
20		20	78599141580		DCF PULL EL F/F 1/2 STL-CTY HL601	C	530.3800	106.08	2.00
500		500	78325030274		IDI 30-274 SIZE 74B YEL WIRECONN	M	71.9000	35.95	2.00
500		500	98010012295		BWC THHN 10STR RED THHN-10-RED-19STR-C	M	112.3284	56.16	2.00
1		1	78393658510		KIL SC-1-LB SEALING COMPOUND	E	11.3500	11.35	2.00
15		15	04667726660		WLA F96T12/CW/HO/EW FLUOR LAMP	E	3.5000	52.50	2.00
30		30	04667724470		WLA F34CW/RS/EW/ALTO RS FLUOR LAMP 30	E	1.3720	41.16	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED /OTHER TAX APPLICABLE
- - STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 07/08/05
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$6.06 IF PAID BY 06/18/05

ACCOUNTING COPY

SUB TOTAL

303.20

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED /OTHER TAX

STATE TAX

PAYMENT REC'D

TOTAL AMOUNT DUE

303.20


KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

INVOICE

INVOICE NUMBER

DATE

1281100-01

11/04/05

 BILLELAN CHEMICAL CO INC
 TO: 268 DOREMUS AVE

NEWARK NJ 07105

 SHIPELAN CHEMICAL CO INC
 TO: 268 DOREMUS AVE

NEWARK NJ 07105

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO
1281100-01	130	10/31/05	4	44706	11/02/05	1

SHIPPING INSTRUCTIONS

FAX344-1948

FRT.

B

 THIS INVOICE SUBJECT TO THE
 TERMS AND CONDITIONS GIVEN
 ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD	SHIPPED							
4		4			DUE TO FUEL CRISIS, TEMPORARY \$5 SURCHARGE ON TRUCK DELIVERY				
10		10	04667724005		*ROB PSJ218CQMVBL5	UT	46.5300	186.12	2.00
12		12	04667711416		WLA PL-C 18W41/4P ALTO 4P 4100K	E	6.6500	66.50	2.00
2		2			WLA MH175/U/M ED17 CLEAR MED BASE UNIV	E	23.8000	285.60	2.00
2		2	78590152301		*LOL 1114TS6D	UT	82.5000	165.00	2.00
1		1	78590106435		SQD 9998-PC-242 CONTACT PARTS KIT	E	9.4300	18.86	2.00
					SQD 9036-DW-31 FLOAT SW NEMA 4 CLOSE R	E	214.9600	214.96	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED /OTHER TAX APPLICABLE
- - STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

4.06

0.00

 NET TERMS: INV 30 DUE: 12/04/05
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$18.74 IF PAID BY 11/14/05

ACCOUNTING COPY

SUB TOTAL

937.04

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

4.06

FED./OTHER TAX

STATE TAX

PAYMENT REC'D.

TOTAL AMOUNT DUE

941.10

INVOICE



KEER Electrical Supply Co.

INVOICE NUMBER

DATE

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

1281662-01

11/29/05

 BILLELAN CHEMICAL CO INC
 TO: 268 DOREMUS AVE

 SHIPELAN CHEMICAL CO INC
 TO: 268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO
1281662-01	130	11/17/05	4	44801	11/22/05	1

DELIVER OUR TRUCK

 SHIPPING INSTRUCTIONS
 FAX344-1948
FRT.
B
 THIS INVOICE SUBJECT TO THE
 TERMS AND CONDITIONS GIVEN
 ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
1		0			DUE TO FUEL CRISIS, TEMPORARY \$5 SURCHARGE ON TRUCK DELIVERY				
1		1	78325035305	C	*IDEAL 35-052 9-1/2 CABLE CUTTER	E	37.1400	0.00	2.00
500		500	98010022710		IDI 35-3052 9 1/2" SM. GRIP CABLE CUT	EA	37.1400	37.14	2.00
10		10	78590140010		SWF TFFN 16STR WHT TFFN-16-WHT-26STR-C	M	72.8669	36.43	2.00
1		1	78590100438		SQD 00120 SP-120/240V-20A C/B	E	8.0900	80.90	2.00
20		20	78358543522		SQD 00370 3P-240V-70A CB	E	92.4300	92.43	2.00
15		15	04667726660		HUB HBL5362 GRD DPLX RCPT-NMA5-20R	E	15.1000	302.00	2.00
					WLA F96T12/CW/HO/EW FLUOR LAMP	E	3.5000	52.50	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- M - FED / OTHER TAX APPLICABLE
- - STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

 NET TERMS: INV 30 DUE: 12/29/05
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$12.03 IF PAID BY 12/09/05

ACCOUNTING COPY

SUB TOTAL

601.40

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED / OTHER TAX

STATE TAX

PAYMENT REC'D

TOTAL AMOUNT DUE

601.40



Serving you since 1939



INVOICE

KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805
ELACHE

INVOICE NUMBER

DATE

1263321-01

03/16/04

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVESHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.
1263321-01	130	03/12/04	4	39579	03/12/04	1

SHIPPING INSTRUCTIONS

DELIVER OUR TRUCK

FAX344-1948

FRT.

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
1		0			OUR NEW E-MAIL ADDRESS IS info@keerelectric.com				
100		100	63972012146	B	*KLEIN 1104 7-5/8 CABLE CUTTER	E	23.4900	0.00	2.0
4		4	78500780250		M-TAL TTS33 12X3/4 PAN TRI TAP SCR	C	3.7575	3.76	2.0
6		2	SUW 1020	B	PS 3869 ANGLE PLUG-NEMA6-30P	E	18.6400	74.56	2.0
2	1	1	78590186721	B	SUR 1020 12 VOLT 7AH BATTERY	EA	18.0000	36.00	2.0
					SQD 9998-SL-2 CONTACT KIT 3POLE SIZE 0	E	65.0000	65.00	2.0
2	1	1	78590186722	B	SQD 9998-SL-3 CONTACT KIT 3 POLE SIZE	E	24.0000	94.00	2.0
2		2	78621080610		T-B WM-A-Z A-THRU-Z MARKER BOOK	E	6.5700	13.14	2.0
10	10	0	78358517305	B	HUB HBL5266-CA ANG PLUG-NEMA5-15P	E	11.1500	0.00	2.0
10		10	78358517300		HUB HBL5266-C PLUG-NEMA5-15P	E	8.6500	86.50	2.0
4	3	1	03266457591	B	EAG 1232-BOX SFC RCPT-NEMA6-30P	E	16.6000	16.60	2.0
15		15	04667726660		WLA F96T12/CW/HO/EW FLUOR LAMP	E	3.5560	53.34	2.0

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED./OTHER TAX APPLICABLE
- - STATE & FEDERAL TAX APPL.
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

SUB TOTAL

MISC. CHARGE
TELE CHARGE
FREIGHT TOTAL
FED./OTHER TAX
STATE TAX
PAYMENT REC'D.

CONTINUED

TOTAL AMOUNT DUE

ORIGINAL



INVOICE

COMPTON CAPITAL CORP
NJ STATE VENDOR NUMBER
222788977-00

KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805
ELACHE

INVOICE NUMBER

DATE

1265667-01

05/24/04

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

SHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

INVOICE NUMBER		SLSMN.	ORDER DATE	TAKEN BY	CUSTOMER PO NUMBER	SHIP DATE	PAGE NO.
1265667-01		130	05/20/04	4	40678	05/20/04	1
SHIPPING INSTRUCTIONS							
DELIVER OUR TRUCK				FAX 344-1948			
QUANTITY			E D P NUMBER	TAX CODE	MANUFACTURER • CATALOGUE NO. • DESCRIPTION		
ORDERED	BACK ORD.	SHIPPED					
					OUR NEW E-MAIL ADDRESS IS info@keerelectric.com		
250	250	0	98001534706	B	ABX 10/3 MC CABLE 10/3 MC CABLE W/GREE		
17	17	0	78599110659	B	STC CWXV 2-3/4D BX SW BOX W/BKT		
4		4	78590140094		SOD 002020 SP-20-20A CB		
10	3	7	78358543522	B	HUB HBL5362 GRD DPLX RCPT-NMA5-20R		
25		25	78621005232		T-B 5232 1/2 STR L/T FLEX CONN		
15		15	04667725840		WLA F96T12/CW/EW 425MA FLUOR LAMP		
15		15	04667726660		WLA F96T12/CW/HO/EW FLUOR LAMP		
100		100	98003080702		ARC 1/2 COND V.A.W.		
3	1	2	7844903020	B	MER M401/240 RS/ESB/120V NEW # M401/24		

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED /OTHER TAX APPLICABLE
- + - STATE & FEDERAL TAX APPL.
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 06/23/04
YOU MAY DEDUCT A CASH DISCOUNT
OF \$11.23 IF PAID BY 06/03/04.

ORIGINAL

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

SUB TOTAL	561.69
MISC. CHARGE	
TELE CHARGE	
FREIGHT TOTAL	
FED./OTHER TAX	
STATE TAX	
PAYMENT REC'D	
TOTAL AMOUNT DUE	561.69


KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

 BILLELAN CHEMICAL CO INC
 TO: 268 DOREMUS AVE

NEWARK

NJ 07105



INVOICE

INVOICE NUMBER

DATE

1268554-01

08/27/04

 SHIPELAN CHEMICAL CO INC
 TO: 268 DOREMUS AVE

NEWARK

NJ 07105

 RECEIVED
 AUG 31 2004

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.
1268554-01	130	08/24/04	125	41536	08/24/04	1

DELIVER OUR TRUCK

SHIPPING INSTRUCTIONS

FAX344-1948

FRT.

B

 THIS INVOICE SUBJECT TO THE
 TERMS AND CONDITIONS GIVEN
 ON THE BACK OF THIS INVOICE.

QUANTITY			EDP NUMBER	CODE	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
100		100	63972010800		OUR NEW E-MAIL ADDRESS IS info@keerelectric.com				
100		100	63972010801		M-TAL TEK D1 8X1/2 1/4 HEX HD DRL SCR	C	3.7725	3.77	2.00
2	2	0		B	M-TAL TEK D2 8X3/4 1/4 HEX HD DRL SCR	C	4.1250	4.13	2.00
2	2	0		B	*ALLIED MOLD AM1206RT STAHLIN RJ1412HLL	UT	51.8500	0.00	2.00
5		5	78621080610		*ALLIED MOLD PA120 INTERIOR PANEL	UT	7.2000	0.00	2.00
1000		1000	78621082457		T-B WM-A-Z A-THRU-Z MARKER BOOK	E	6.1320	30.66	2.00
10		10	05400710810		T-B TY25M BULK 7.3 X .184	C	5.4000	54.40	2.00
					MMM 35 3/4 X 66FT/RED CODING TAPE	E	3.5000	32.50	2.00
10		10	05400710869		MMM 35 3/4 X 66FT/ORN CODING TAPE	E	3.2500	32.50	2.00
60	60	0	98010026365	B	NMC RX 8/3 W/GRD NM-B-8/3-CU-WG-125CL	M	1010.1231	0.00	2.00
30		30	04667724470		WLA F34CW/RS/EW/ALTO RS FLUOR LAMP 30	E	1.3720	41.16	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED/OTHER TAX APPLICABLE
- - STATE & FEDERAL TAX APPL.
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

 NET TERMS: INV 30 DUE: 09/26/04
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$3.98 IF PAID BY 09/06/04

SUB TOTAL

199.12

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED/OTHER TAX

STATE TAX

PAYMENT REC'D.

TOTAL AMOUNT DUE

199.12

ORIGINAL



Serving you since 1939

SUB. POMPTON CAPITAL CORP
N.J. STATE VENDOR NUMBER
222768977-00

KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805
ELACHE

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

**INVOICE**

INVOICE NUMBER

DATE

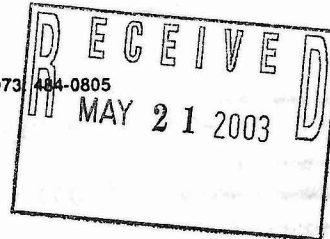
1252994-01

05/19/03

SHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

**POSTED D.H.**

POSTED D.H.

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO
1252994-01	130	05/15/03	4	37152	05/15/03	1
SHIPPING INSTRUCTIONS						
DELIVER OUR TRUCK						B
FAX344-1948						
QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M
ORDERED	BACK ORD.	SHIPPED				
					OUR NEW E-MAIL ADDRESS IS info@keerelectric.com	
20	15	5	78500722006	B	PS 2006 SOCKET EXTENSION	E
12		4	04667722009	B	WLA SLS25 FLUOR LAMP SUB 4/100W LMP	E
1	1	0		B	*SQD 9001KS49B SEL SW OPER	E
20		20	04667737693		WLA 755 6.3V.15A T3-1/4MINBAY LMP	E
6		6	78590188000		SQD 9001-KA-1 CONTACT BLOCK	E
					0	
3		3	78590140076		SQD Q0340 3P-240V-40A CB	E
					0	
100		100	78621080692		T-B TC5342A 1.125 SQ ADHESIVE MTG BASE	C
100	100	0	78621080719	B	T-B 2RA18X 22-18 INS BUTT CONN	C
100		100	78621080720		T-B 2RB14X 16-14 INS BUTT CONN	C
50		50	78621080721		T-B 2RC10X 12-10 INS BUTT CONN	C
10		10	05400706143		MMM 88 3/4 X 66FT ELECT TAPE	E
					0	

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

UNIT PRICE	AMOUNT	CD%
2.9000	14.50	2.0
16.4500	65.80	2.0
21.2670	0.00	2.0
1.2420	24.84	2.0
17.2710	103.63	2.0
94.2000	282.60	2.0
65.3300	65.33	2.0
27.5600	0.00	2.0
27.2900	27.29	2.0
40.4800	20.24	2.0
3.8800	38.80	2.0

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED/OTHER TAX APPLICABLE
- STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

SUB TOTAL

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED./OTHER TAX

STATE TAX

PAYMENT REC'D

CONTINUED

TOTAL AMOUNT DUE

ORIGINAL



Serving you since 1939

SUB. POMPTON CAPITAL CORP
N.J. STATE VENDOR NUMBER
222768977-00

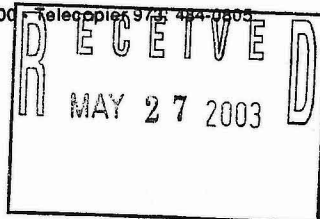
KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopiers 973: 484-0803
ELACHE

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105



INVOICE

INVOICE NUMBER

DATE

1252994-02

05/21/03

SHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

INVOICE NUMBER	SLSMN.	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.
1252994-02	130	05/15/03	4	37152	05/19/03	1

SHIPPING INSTRUCTIONS

FRT.

DELIVER OUR TRUCK

FAX344-1948

R

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
12			8 04667722009		OUR NEW E-MAIL ADDRESS IS info@keerelectric.com WLA SLS25 FLUOR LAMP SUB 4/100W LMP	E	16.4500	131.60	2.00

POSTED D.H.

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED./OTHER TAX APPLICABLE
- * - STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 06/20/03
YOU MAY DEDUCT A CASH DISCOUNT
OF \$2.63 IF PAID BY 05/31/03

SUB TOTAL 131.60
MISC. CHARGE
TELE CHARGE
FREIGHT TOTAL
FED./OTHER TAX
STATE TAX
PAYMENT REC'D

TOTAL AMOUNT DUE

131.60

ORIGINAL



Serving you since 1939

SUB POMPTON CAPITAL CORP
N.J. STATE VENDOR NUMBER
222768977-00

KEER Electrical Supply Co.287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805
ELACHE

INVOICE

INVOICE NUMBER

DATE

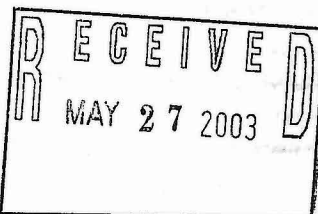
1253227-01

05/22/03

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105



SHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

INVOICE NUMBER	SLSMN.	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.
1253227-01	130	05/22/03	2	37227	05/22/03	1

SHIPPING INSTRUCTIONS

DELIVER OUR TRUCK

FAX344-1948

FRT.

B

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
30		30	04667725840		OUR NEW E-MAIL ADDRESS IS info@keerelectric.com WLA F96T12/CW/EW 425MA FLUOR LAMP	E	2.6460	79.38	2.00

POSTED D.H.

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED/OTHER TAX APPLICABLE
- + - STATE & FEDERAL TAX APPL.
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 06/21/03
YOU MAY DEDUCT A CASH DISCOUNT
OF \$1.59 IF PAID BY 06/01/03

SUB TOTAL

79.38

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED/OTHER TAX

STATE TAX

PAYMENT REC'D

TOTAL AMOUNT DUE

79.38



Serving you since 1939

SUB. POMPTON CAPITAL CORP
N.J. STATE VENDOR NUMBER
222768977-00

KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805
ELACHE

**INVOICE**

INVOICE NUMBER

DATE

1257404-01

09/22/03

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

SHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

INVOICE NUMBER		SLSMN.	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.		
1257404-01		130	09/18/03	4	38167	09/18/03	1		
SHIPPING INSTRUCTIONS							FRT.		
DELIVER OUR TRUCK							B		
FAX344-1948							B		
QUANTITY			E D P NUMBER	CODE	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
6	6	0			OUR NEW E-MAIL ADDRESS IS				
1	1	0			info@keerelectric.com				
1		0		B	*ULT 631LHTCP000C 1-60T12/HO 120 BL	E	47.8500	0.00	2.00
1		0		B	*KLEIN 700-12 12-IN HACKSAW FRAME	E	13.4000	0.00	2.00
1		0		B	*KLEIN 603-4 NO-2 PHILLIPS SCR-DRVR	E	6.0800	0.00	2.00
1		0		B	*KLEIN 601-4 4-IN RD-SHANK SCR-DRVR	E	5.4900	0.00	2.00
2		0		B	*KLEIN 605-4 4-IN CAB-PT SCR-DRVR	E	6.0300	0.00	2.00
		2	78331035952		GRE 1010 SUB 38880	E	17.2500	34.50	2.00
10		9	78590100604	C	POCKET VOLTAGE TESTE				
					SQD 8501-AR-51 1 LETTER FOR KP/KPD-JCK 8	E	7.6856	69.17	2.00
500		500	78621080507		T-B TY523M LOCK TIES 3.62" X .094	C	8.8200	44.10	2.00
15		15	04667726660		WLA F96T12/CW40/26 FLUOR LAMP	E	3.5560	53.34	2.00
25		25	78621000603		T-B 603 1X3/4 THRD REDUCER	C	117.9600	29.49	2.00
50		50	78621000601		T-B 601 3/4X1/2 THRD REDUCER	C	78.0500	39.03	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED/OTHER TAX APPLICABLE
- - STATE & FEDERAL TAX APPL.
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 10/22/03
YOU MAY DEDUCT A CASH DISCOUNT
OF \$5.39 IF PAID BY 10/02/03

ORIGINAL

SUB TOTAL 269.63

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED/OTHER TAX

STATE TAX

PAYMENT REC'D.

TOTAL AMOUNT DUE

269.63



Serving you since 1939

SUB. POMPTON CAPITAL CORP
N.J. STATE VENDOR NUMBER
222766977-00

KEER Electrical Supply Co.

287 Mt. Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805
LACHE

BILL ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

SHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

INVOICE

INVOICE NUMBER

DATE

1258998-01

11/04/03

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.
1258998-01	130	10/31/03	4	38450	10/31/03	1

SHIPPING INSTRUCTIONS

FRT.

DELIVER OUR TRUCK

FAX344-1948

A

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. , DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD.	SHIPPED							
6	6	0		B	OUR NEW E-MAIL ADDRESS IS info@keerelectric.com				
6		0		B	*GE FLE20TBX/L/SPX27 FLUOR LAMP	E	14.6000	0.00	2.00
24		24	7844904097✓		*GE FLE280BX/A/827 COMPACT FLUOR LMP	E	18.3500	0.00	2.00
3		3	78590158818✓		MER M401 LATCH LATCH F/M401 LENS	EA	2.5000	60.00	2.00
					SQD CC-132.0 HTR ELEMENT	E	9.3700	28.11	2.00
					0				
3		3	78590116966✓		SQD B-88.0 HTR ELEMENT	E	9.3700	28.11	2.00
					0				
		10	78590140006✓		SQD 00115 SP-120/240V-15A CB	E	8.9000	89.00	2.00
					0				
		10	78590140010✓		SQD 00120 SP-120/240V-20A C/B	E	8.9000	89.00	2.00
		3	78590140094✓		SQD 002020 SP-20-20A CB	E	29.1000	87.30	2.00
					0				
		2	78590140090✓		SQD 001515 SP-15-15A CB	E	29.1000	58.20	2.00

POSTED L.P.

RECEIVED
NOV 06 2003

CODE EXPLANATION
- STATE TAX APPLICABLE
- FED/OTHER TAX APPLICABLE
- STATE & FEDERAL TAX APPL.
- BALANCE BACK ORDERED
- CONSIDER COMPLETE
- EXACT SHIPMENT
- FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

SUB TOTAL

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED/OTHER TAX

STATE TAX

PAYMENT REC'D

CONTINUED

TOTAL AMOUNT DUE

ORIGINAL



INVOICE

KEER Electrical Supply Co.

Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

INVOICE NUMBER

DATE

1258998-03

11/10/03

AN CHEMICAL CO INC
8 DOREMUS AVESHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK NJ 07105

NEWARK

NJ 07105

NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO
03	130	10/31/03	4	38450	11/06/03	1

SHIPPING INSTRUCTIONS

FRT.

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

OUR TRUCK

FAX 344-1948

E

QUANTITY

CK ORD.	SHIPPED	E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
				OUR NEW E-MAIL ADDRESS IS info@keerelectric.com				
				*GE FLE20TBX/L/SPX27 FLUOR LAMP	E	14.6000	87.60	2.00

POSTED L.P.

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED /OTHER TAX APPLICABLE
- + - STATE & FEDERAL TAX APPL
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

7.98

3.57

NET TERMS: INV 30 DUE: 12/10/03
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$1.75 IF PAID BY 11/20/03

ORIGINAL

SUB TOTAL 87.60
 MISC. CHARGE
 TELE CHARGE
 FREIGHT TOTAL 11.55
 FED./OTHER TAX
 STATE TAX
 PAYMENT REC'D

TOTAL AMOUNT DUE

99.15



Serving you since 1939



INVOICE

INVOICE NUMBER

DATE

1258998-02

11/10/03

KEER Electrical Supply Co.

1 Pleasant Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805
HE

SHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK NJ 07105

NEWARK NJ 07105

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P O NUMBER	SHIP DATE	PAGE NO.
58998-02	130	10/31/03	4	38450	11/04/03	1

SHIPPING INSTRUCTIONS

FRT.

B

DRIVER OUR TRUCK

FAX344-1948

QUANTITY		E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
BACK ORD.	SHIPPED							
				OUR NEW E-MAIL ADDRESS IS info@keerelectric.com				
6				*GE FLE28QBX/A/827 COMPACT FLUOR LMP	E	18.3500	110.10	2.00
4		78621005256		T-B 5256 1-1/2 90D L/T FLEX CONN	C	1790.0680	71.60	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED./OTHER TAX APPLICABLE
- + - STATE & FEDERAL TAX APPL.
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN	FREIGHT OUT
4.74	4.77

NET TERMS: INV 30 DUE: 12/10/03
YOU MAY DEDUCT A CASH DISCOUNT
OF \$3.63 IF PAID BY 11/20/03

SUB TOTAL 181.70
MISC. CHARGE
TELE CHARGE
FREIGHT TOTAL 9.51
FED./OTHER TAX
STATE TAX
PAYMENT REC'D

TOTAL AMOUNT DUE
191.21

ORIGINAL

INVOICE

KEER Electrical Supply Co.

Avenue • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

INVOICE NUMBER

DATE

1259771-01

11/25/03

ELAN CHEMICAL CO INC
268 DOREMUS AVESHIP TO: ELAN CHEMICAL CO INC
268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

ICE NUMBER	SLSMN.	ORDER DATE	TAKEN BY	CUSTOMER P O NUMBER	SHIP DATE	PAGE NO.
71-01	130	11/21/03	4	38655	11/21/03	2

SHIPPING INSTRUCTIONS

FRT.

BUCK 11/24 AM 11

FAX 344-1948

B

QUANTITY		E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
BACK ORD.	SHIPPED							
2	2	66119110410		SES SS211-16A-BG 20A DPST TGL SW Ø	E	13.6800	27.36	2.00
5	15	04667725840		WLA F96T12/CW/EW 425MA FLUOR LAMP	E	2.6460	39.69	2.00
2	2	78590152436		SQD 9001-SKS-11B BLK PB OPER Ø	E	24.4600	48.92	2.00

CODE EXPLANATION

* - STATE TAX APPLICABLE
 # - FED./OTHER TAX APPLICABLE
 + - STATE & FEDERAL TAX APPL.
 B - BALANCE BACK ORDERED
 C - CONSIDER COMPLETE
 D - DIRECT SHIPMENT
 F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 12/25/03
 YOU MAY DEDUCT A CASH DISCOUNT
 OF \$8.60 IF PAID BY 12/05/03

ORIGINAL

THIS INVOICE SUBJECT TO THE
 TERMS AND CONDITIONS GIVEN
 ON THE BACK OF THIS INVOICE.

SUB TOTAL

429.79

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED./OTHER TAX

STATE TAX

PAYMENT REC'D

TOTAL AMOUNT DUE

429.79



INVOICE

Electrical Supply Co.

Newark • Newark, NJ 07104 • Telephone 973: 484-7400 • Telecopier 973: 484-0805

INVOICE NUMBER

DATE

1260119-01

12/08/03

LELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

SHIP ELAN CHEMICAL CO INC
TO: 268 DOREMUS AVE

NEWARK

NJ 07105

NEWARK

NJ 07105

THIS INVOICE SUBJECT TO THE
TERMS AND CONDITIONS GIVEN
ON THE BACK OF THIS INVOICE.

INVOICE NUMBER	SLSMN	ORDER DATE	TAKEN BY	CUSTOMER P.O. NUMBER	SHIP DATE	PAGE NO.
1260119-01	130	12/04/03	4	38740	12/04/03	2

SHIPPING INSTRUCTIONS

OUR TRUCK 12/05

FAX344-1948

FRT.

B

QUANTITY			E D P NUMBER	CODE TAX	MANUFACTURER • CATALOGUE NO. • DESCRIPTION	U/M	UNIT PRICE	AMOUNT	CD%
ORDERED	BACK ORD	SHIPPED							
3		3	05400710810		MMM 35 3/4 X 66FT/RED CODING TAPE	E	3.1900	9.57	2.00
100		100	78325030073		IDI 30-073 SIZE 73B ORG WIRECONN	M	70.9600	7.10	2.00
30		30	04667724470		WLA F34CW/RS/EW/ALTO RS FLUOR LAMP 30	E	1.2740	38.22	2.00
24		24	04667729360		WLA 75A/RS/VS/120V MED RS VS LAMP 120-	E	3.0780	73.87	2.00

CODE EXPLANATION

- * - STATE TAX APPLICABLE
- # - FED./OTHER TAX APPLICABLE
- + - STATE & FEDERAL TAX APPL.
- B - BALANCE BACK ORDERED
- C - CONSIDER COMPLETE
- D - DIRECT SHIPMENT
- F - FACTORY MINIMUM

FREIGHT IN

FREIGHT OUT

NET TERMS: INV 30 DUE: 01/07/04
YOU MAY DEDUCT A CASH DISCOUNT
OF \$11.41 IF PAID BY 12/18/03

SUB TOTAL

570.25

MISC. CHARGE

TELE CHARGE

FREIGHT TOTAL

FED./OTHER TAX

STATE TAX

PAYMENT REC'D

TOTAL AMOUNT DUE

570.25

ORIGINAL

**SAMSON ELECTRICAL SUPPLY CO., INC.**385 RECTOR ST. • P.O. BOX 228 • PERTH AMBOY, N.J. 08862
(732) 826-7070 FAX (732) 442-8835

INVOICE NUMBER

ELAINC

973-344-8014

INVOICE NUMBER

1198750-01

BILL ELAN INCORPORATED
TO: 268 DOREMUS AVE
NEWARK NJ 07105SHIP ELAN INCORPORATED
TO: 268 DOREMUS AVE
NEWARK NJ 07105

CUSTOMER P.O. NO.

CUSTOMER P.O. NO. 34676

INVOICE NUMBER		SLSMN	ORDER DATE	TAKER	CUSTOMER P.O. NUMBER		DATE	
1198750-01		107	09/09/02	147	34676		09/12/02	
INSTRUCTIONS							FRT.	PAGE NO.
							B	1
QUANTITY			DISP.	ITEM CODE AND DESCRIPTION	U/M	UNIT PRICE	AMOUNT	
ORDERED	B.O./RET.	SHIPPED						
				RETURNS WILL BE ACCEPTED ONLY UP TO 6 MTHS FROM INVOICE DATE				
4		4	*	BRADY PWM-PK1	EA	16.3800	65.52	
2		2	*	WIRE MRKR PORTA-PK				
			*	BRADY PWM-PK3	EA	16.3800	32.76	
			*	WIRE MRKR PORTA-PK				
25		25	*	BUSS AGC2	C	28.8000	7.20	
			*	250V SMALL DIM FUSE				
15		15	*	BUSS MDL3	C	76.8000	11.52	
			*	250V SMALL DIM FUSE				
15	5	10	B*	BUSS MDL4	C	76.8000	7.68	
			*	250V SMALL DIM FUSE				
15		15	*	BUSS AGC5	C	44.0400	6.61	
			*	250V SMALL DIM FUSE				
10		10	*	PHIL 500T3Q/P/CL-125-130V	EA	9.5250	95.25	
			*	QTZ LMP				
15		15	*	PHIL F96T12/CW/HO/EW/ALTO	EA	3.4200	51.30	
			*	FLUOR LAMP				
			*	F96T12/CW/HO/EW/ALTO				
100		100	*	SJOW 14/3 YEL	M	550.0000	55.00	
			*	SJOOW/SJOW-14/3-YEL-250SP				
100		100	*	T&B 18RA-8F	C	23.7375	23.74	
			*	22-18 INS SPADE TERM				
			*	100 PER CTN				

CODE EXPLANATION

* - STATE TAX APPLICABLE C - CONSIDER COMPLETE
- FED./OTHER TAX APPLICABLE D - DIRECT SHIPMENT
+ - STATE & FEDERAL TAX APPL. F - FACTORY MINIMUM
B - BALANCE BACK ORDERED R - RETURNED CYL.

FREIGHT IN

FREIGHT OUT

SUB TOTAL

MISC. CHARGE

TELE. CHARGE

FREIGHT TOTAL

FED./OTHER TAX

STATE TAX

PAYMENT REC'D.

CONTINUED

ORIGINAL

**SAMSON ELECTRICAL SUPPLY CO., INC.**385 RECTOR ST. • P.O. BOX 228 • PERTH AMBOY, N.J. 08862
(732) 826-7070 FAX (732) 442-8835

INVOICE NUMBER

ELAINC

973-344-8014

INVOICE NUMBER

1199896-01

BILL ELAN INCORPORATED

TO: 268 DOREMUS AVE

NEWARK

NJ

07105

SHIP ELAN INCORPORATED

TO: 268 DOREMUS AVE

NEWARK

NJ 07105

CUSTOMER P.O. NO.

CUSTOMER P.O. NO. 34851

POSTED G.C.

INVOICE NUMBER		SLSMN	ORDER DATE	TAKER	CUSTOMER P.O. NUMBER		DATE	
1199896-01		107	09/24/02	147	34851		09/27/02	
INSTRUCTIONS							FRT.	PAGE NO.
							B	1
QUANTITY			DISP.	ITEM CODE AND DESCRIPTION	U/M	UNIT PRICE	AMOUNT	
ORDERED	B.O./RET.	SHIPPED						
				RETURNS WILL BE ACCEPTED ONLY UP TO 6 MTHS FROM INVOICE DATE				
40		40	*	S-STRUT A1200HS-10-PG GALV SLOTCHNL	C	111.6360	44.65	
40		0	C*	S-STRUT B1200HS-10-PG GALV SLOTCHNL *USE B1400HS-10-PG*	C	115.6400	0.00	
50		50	*	B-LINE N224-1/4 PLTD SPRING NUT	C	65.6400	32.82	
50		50	*	B-LINE N228-3/8 PLTD SPRING NUT	C	73.3200	36.66	
100		100	*	B-LINE B2011-1-1/4 CLAMP	C	95.8800	95.88	
100		100	*	B-LINE B2012-1-1/2 CLAMP	C	117.7200	117.72	
60		60	*	PHIL F40CW/RS/EW/ALTO FLUOR LMP	EA	1.4250	OK 85.50 ADJ 487	
				F34CW/RS/EW/ALTO				
12		0	B*	PHIL 65BR30/FL55/12/1-120V LAMP	EA	2.6250	0.00	
3		3	*	MULB 97153 3G SAT-SS BLANK PLT	C	234.9000	7.05	
3	3	0	B*	*RADIOSHACK 64-015C .50 DIA SOLDER	EA	8.2500	0.00	

CODE EXPLANATION

* - STATE TAX APPLICABLE
- FED./OTHER TAX APPLICABLE
+ - STATE & FEDERAL TAX APPL.
B - BALANCE BACK ORDERED

C - CONSIDER COMPLETE
D - DIRECT SHIPMENT
F - FACTORY MINIMUM
rt - RETURNED CYL.

*** THIS IS YOUR INVOICE ***

FREIGHT IN	FREIGHT OUT

NET TERMS: INV 30

DUE: 10/27/02

SUB TOTAL	420.28
MISC. CHARGE	
TELE. CHARGE	
FREIGHT TOTAL	
FED./OTHER TAX	
STATE TAX	
PAYMENT REC'D.	0.00

TOTAL AMT DUE
420.28

ORIGINAL

SAMSON ELECTRICAL SUPPLY CO., INC.385 RECTOR ST. • P.O. BOX 228 • PERTH AMBOY, N.J. 08862
(732) 826-7070 FAX (732) 442-8835

SEP 20 2002

INVOICE NUMBER

INVOICE NUMBER

ELAINC

1199166-01

973-344-8014

BILL ELAN INCORPORATED

TO: 268 DOREMUS AVE

NEWARK

NJ

07105

SHIP

ELAN INCORPORATED

TO: 268 DOREMUS AVE

NEWARK

NJ

07105

CUSTOMER P.O. NO.

CUSTOMER P.O. NO. 34736

INVOICE NUMBER		SLSMN	ORDER DATE	TAKER	CUSTOMER P.O. NUMBER		DATE	
1199166-01		107	09/13/02	147	34736		09/18/02	
INSTRUCTIONS							FRT.	PAGE NO.
							B	1
QUANTITY			DISP.	ITEM CODE AND DESCRIPTION	U/M	UNIT PRICE	AMOUNT	
ORDERED	B.O./RET.	SHIPPED						
12		12	*	RETURNS WILL BE ACCEPTED ONLY UP TO 6 MTHS FROM INVOICE DATE PHIL SLS25 FLUOR LAMP	EA	16.4500	197.40	

CODE EXPLANATION

* - STATE TAX APPLICABLE
- FED./OTHER TAX APPLICABLE
+ - STATE & FEDERAL TAX APPL.
B - BALANCE BACK ORDERED

C - CONSIDER COMPLETE
D - DIRECT SHIPMENT
F - FACTORY MINIMUM
R - RETURNED CYL.

*** THIS IS YOUR INVOICE ***

FREIGHT IN	FREIGHT OUT

NET TERMS: INV 30 DUE: 10/18/02

*** ORDER COMPLETED ***

SUB TOTAL	197.40
MISC. CHARGE	
TELE. CHARGE	
FREIGHT TOTAL	
FED./OTHER TAX	
STATE TAX	
PAYMENT REC'D.	0.00

TOTAL AMT DUE
197.40

ORIGINAL



SAMSON ELECTRICAL SUPPLY CO., INC.

385 RECTOR ST. • P.O. BOX 228 • PERTH AMBOY, N.J. 08862
(732) 826-7070 FAX (732) 442-8835

INVOICE NUMBER

ELAINC

973-344-8014

INVOICE NUMBER

MAY 30 2002

1191942-01

BILL ELAN INCORPORATED
TO: 268 DOREMUS AVE
NEWARK NJ 07105

SHIP ELAN INCORPORATED
TO: 268 DOREMUS AVE
NEWARK NJ 07105

CUSTOMER P.O. NO.

CUSTOMER P.O. NO. MIKE 05/23/02 11:3

33914

INVOICE NUMBER	SLSMN	ORDER DATE	TAKER	CUSTOMER P.O. NUMBER	DATE
1191942-01	107	05/23/02	147	MIKE 05/23/02 11:3	05/29/02
INSTRUCTIONS					FRT
					B
					PAGE NO.
					1

QUANTITY			DISP.	ITEM CODE AND DESCRIPTION	U/M	UNIT PRICE	AMOUNT
ORDERED	B.O./RET.	SHIPPED					
				RETURNS WILL BE ACCEPTED ONLY UP TO 6 MTHS FROM INVOICE DATE			
20		20	*	BUSS LP-CC30	EA	7.1760	143.52
				LOW-PEAK CC TD FUSE			
12		12	*	PHIL 200/TF	EA	9.3250	111.90
				120V MED SFTY LAMP			
15		15	*	PHIL F96T12/CW/EW/ALTO	EA	3.1500	47.25
				FLUOR LAMP			
10	4	6	B*	SQD Q01520	EA	24.8375	149.03
				SP-15-20A CB			

POSTED G.C.

[Handwritten signature]
6/4/02
LB

CODE EXPLANATION
* - STATE TAX APPLICABLE C - CONSIDER COMPLETE
- FED./OTHER TAX APPLICABLE D - DIRECT SHIPMENT
+ - STATE & FEDERAL TAX APPL F - FACTORY MINIMUM
B - BALANCE BACK ORDERED R - RETURNED CYL.

*** THIS IS YOUR INVOICE ***

FREIGHT IN	FREIGHT OUT

NET TERMS: INV 30

DUE: 06/28/02

SUB TOTAL	451.70
MISC. CHARGE	
TELE. CHARGE	
FREIGHT TOTAL	
FED./OTHER TAX	
STATE TAX	
PAYMENT REC'D.	0.00

TOTAL AMT DUE
451.70

ORIGINAL

**SAMSON ELECTRICAL SUPPLY CO., INC.**385 RECTOR ST. • P.O. BOX 228 • PERTH AMBOY, N.J. 08862
(732) 826-7070 FAX (732) 442-8835

ELAINC

INVOICE NUMBER

973-344-8014

INVOICE NUMBER

1182986-01

JAN 18 2002

BILL ELAN INCORPORATED
TO: 268 DOREMUS AVE
NEWARK NJ 07105SHIP ELAN INCORPORATED
TO: 268 DOREMUS AVE
NEWARK NJ 07105

CUSTOMER P.O. NO.

CUSTOMER P.O. NO. 32619

INVOICE NUMBER	SLSMN	ORDER DATE	TAKER	CUSTOMER P.O. NUMBER	DATE
1182986-01	107	01/10/02	156	32619	01/15/02
INSTRUCTIONS					FRT. PAGE NO.
					B 1

QUANTITY			DISP.	ITEM CODE AND DESCRIPTION	U/M	UNIT PRICE	AMOUNT
ORDERED	S.O./RET.	SHIPPED					
100		100	*	IDEAL 30-073	M	53.8080	5.38
60		60	*	SIZE 73B ORG WIRECONN	EA	1.4250	85.50
15		15	*	PHIL F40CW/RS/EW/ALTO	EA	3.4200	51.30
				FLUOR LMP			
				PHIL F96T12/CW/HO/EW/ALTO			
				FLUOR LAMP			
				F96T12/CW/HO/EW/ALTO			

POSTED G.C.

VENDOR NO.

DATE

SHIP TO
NAME

CODE EXPLANATION

* - STATE TAX APPLICABLE C - CONSIDER COMPLETE
- FED./OTHER TAX APPLICABLE D - DIRECT SHIPMENT
+ - STATE & FEDERAL TAX APPL. F - FACTORY MINIMUM
B - BALANCE BACK ORDERED R - RETURNED CYL.

*** THIS IS YOUR INVOICE ***

FREIGHT IN	FREIGHT OUT

NET TERMS: INV 30 DUE: 02/14/02

*** ORDER COMPLETED ***

SUB TOTAL	142.18
MISC. CHARGE	
TELE. CHARGE	
FREIGHT TOTAL	
FED./OTHER TAX	
STATE TAX	
PAYMENT REC'D.	0.00

TOTAL AMT DUE
142.18

ORIGINAL



SAMSON ELECTRICAL SUPPLY CO., INC.

385 RECTOR ST. • P.O. BOX 228 • PERTH AMBOY, N.J. 08862
(732) 826-7070 FAX (732) 442-8835

INVOICE NUMBER

ELAINC

973-344-8014

INVOICE NUMBER

1200279-01

BILL ELAN INCORPORATED

TO: 268 DOREMUS AVE

NEWARK

NJ 07105

SHIP ELAN INCORPORATED

TO: 268 DOREMUS AVE

NEWARK

NJ 07105

CUSTOMER P.O. NO.

CUSTOMER P.O. NO. 34909

POSTED D.H.

INVOICE NUMBER	SLSMN	ORDER DATE	TAKER	CUSTOMER P.O. NUMBER	DATE
1200279-01	107	09/30/02	147	34909	10/03/02
INSTRUCTIONS					FRT.
					B
					1

QUANTITY			DISP.	ITEM CODE AND DESCRIPTION	U/M	UNIT PRICE	AMOUNT
ORDERED	B.O./RET.	SHIPPED					
4		4	*	RETURNS WILL BE ACCEPTED ONLY UP TO 6 MTHS FROM INVOICE DATE			
4		4	*	LEV 466 SGL PIN PLNGR FLUOR LMPHLDR	C	432.9600	17.32
			*	LEV 467 SGL PIN FIXED FLUOR LMPHLDR	C	342.6000	13.70

10/31/02
AB
W

CODE EXPLANATION

* - STATE TAX APPLICABLE C - CONSIDER COMPLETE
- FED./OTHER TAX APPLICABLE D - DIRECT SHIPMENT
+ - STATE & FEDERAL TAX APPL. F - FACTORY MINIMUM
B - BALANCE BACK ORDERED R - RETURNED CYL.

*** THIS IS YOUR INVOICE ***

FREIGHT IN	FREIGHT OUT

NET TERMS: INV 30 DUE: 11/02/02

*** ORDER COMPLETED ***

SUB TOTAL	31.02
MISC. CHARGE	
TELE. CHARGE	
FREIGHT TOTAL	
FED./OTHER TAX	
STATE TAX	
PAYMENT REC'D.	0.00

TOTAL AMT DUE
31.02

**SAMSON ELECTRICAL SUPPLY CO., INC.**385 RECTOR ST. • P.O. BOX 228 • PERTH AMBOY, N.J. 08862
(732) 826-7070 FAX (732) 442-8835

JUN 14 2002

INVOICE NUMBER

ELAINC

973-344-8014

INVOICE NUMBER

1192909-01

BILL ELAN INCORPORATED

TO: 268 DOREMUS AVE

NEWARK

NJ 07105

SHIP ELAN INCORPORATED

TO: 268 DOREMUS AVE

NEWARK

NJ 07105

CUSTOMER P.O. NO.

CUSTOMER P.O. NO. 33825

INVOICE NUMBER	SLSMN	ORDER DATE	TAKER	CUSTOMER P.O. NUMBER	DATE
1192909-01	107	06/07/02	147	33825	06/13/02

INSTRUCTIONS

FRT.

PAGE NO.

B

1

QUANTITY			DISP.	ITEM CODE AND DESCRIPTION	U/M	UNIT PRICE	AMOUNT
ORDERED	B.O./RET.	SHIPPED					
2		2	*	RETURNS WILL BE ACCEPTED ONLY UP TO 6 MTHS FROM INVOICE DATE LEV 390-1W MED BIPIN FLUOR LAMPHLDR	C	181.0800	3.62

ELAN INC.

VENDOR NR

DATE 6/20/02 ENTERED BY

SPECIAL
NOTES

POSTED G.C.

CODE EXPLANATION

* - STATE TAX APPLICABLE C - CONSIDER COMPLETE
- FED./OTHER TAX APPLICABLE D - DIRECT SHIPMENT
+ - STATE & FEDERAL TAX APPL. F - FACTORY MINIMUM
B - BALANCE BACK ORDERED rt - RETURNED CYL.

*** THIS IS YOUR INVOICE ***

FREIGHT IN	FREIGHT OUT

NET TERMS: INV 30 DUE: 07/13/02

*** ORDER COMPLETED ***

SUB TOTAL	3.62
MISC. CHARGE	
TELE. CHARGE	
FREIGHT TOTAL	
FED./OTHER TAX	
STATE TAX	
PAYMENT REC'D.	0.00

TOTAL AMT DUE
3.62

ORIGINAL

RESPONSE TO ALLEGED NOV_s
& IRLs

ATTACHMENT 13

RCRA APPLICABILITY ANALYSIS
JULY 18, 2006

Elan Chemical Company, Inc.
Newark, NJ

ELAN CHEMICAL COMPANY, INC.
Newark, NJ

RCRA APPLICABILITY ANALYSIS – JULY 18, 2006

NOTE: The determination of whether a material is considered a RCRA regulated hazardous waste is dependent, in part, on how the material is generated and the disposition of the material (i.e., re-used, recycled, discarded, disposed, etc.). In order to be a RCRA regulated hazardous waste the material must meet the definition of a characteristically hazardous waste (ignitability, corrosivity, reactivity, or toxicity) or be a 'listed' waste.

WASTE GENERATION

Compound SB material is produced as a by-product when producing any of up to 80 different products. Compound SB material may be generated in any of 17 distillation systems. A distillation system typically includes a distillation bottom vessel, distillation column, condenser, flask, and receiver. The operation of a distillation system typically includes:

- ☐ Addition of product or intermediate to the still
- ☐ Heating the still
- ☐ Column fractionization
- ☐ Condensation
- ☐ Collection
- ☐ Removal of still bottoms

Compound SB materials includes:

- Material removed from the bottom of the still after completion of a batch. This Compound SB material contains:
 - Water
 - Reactant/distillation residue
 - Trace quantity of product
- "First cut" material from a distillation. This Compound SB material is typically high in light-end (or low boiler) organics.

DISCUSSION

Compound SB material is not a RCRA regulated characteristic hazardous waste as generated from the distillation processes since:

⇒ The material does not meet the criteria for ignitability (i.e., flash point of material is > 140 deg. F).

AND

⇒ The material does not meet other criteria for being 'characteristically' hazardous (i.e., corrosivity, reactivity, or toxicity; note toxicity evaluation requires a Toxicity Characteristic Leaching Procedure (TCLP) test).

And, the Compound SB material does not qualify as a listed hazardous waste mixture because the only listed wastes that are contained in it are F003 wastes, which are listed solely for ignitability, but the mixture is not ignitable.

Reference RCRA analyses on file for determinations. Note that Elan is currently conducting RCRA analyses on waste streams based on production schedules. Attachment 15 includes analyses on four waste streams. Some results are still pending the completion of lab analyses.

Per §261.3(g) (1) and (2), a hazardous waste, or mixture of solid waste and hazardous waste, listed in Subpart D (i.e., the F, K, P, and U listed wastes) is not a hazardous waste if the waste does not exhibit any characteristic of hazardous waste (i.e., ignitability, corrosivity, or reactivity).

Compound SB is not a hazardous waste since it is not characteristically hazardous and would not be regulated as an "F" listed waste based on the § 261.3(g) exemption.

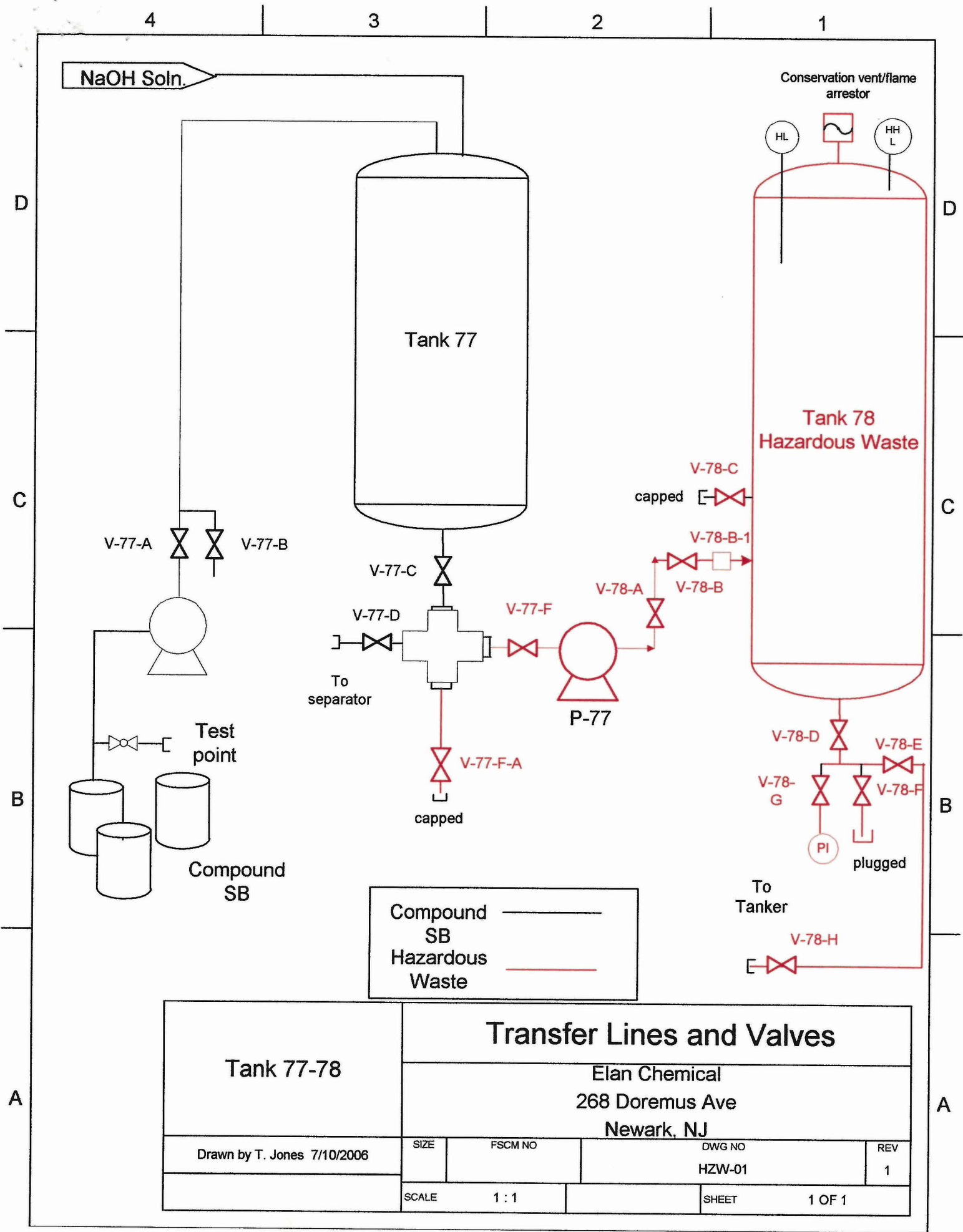
RCRA REGULATED ACTIVITIES/APPLICABILITY

Except for listed hazardous wastes, the generation of hazardous waste begins when a waste exhibits a characteristic of ignitability, corrosivity, reactivity, or toxicity. The waste potentially exhibits the characteristic of ignitability when it enters Tank 78. RCRA regulated activities would therefore include:

- ☐ The transfer of hazardous waste into Tank 78
- ☐ Tank 78
- ☐ Transfer from Tank 78 to tank truck

See the attached PID for delineation of the hazardous waste management equipment.

NJDEP, Bureau of Hazardous Waste Compliance & Enforcement has inspected Elan's facility in prior years (including 2003, 2005, and 2005) and has not cited Elan for violating RCRA provisions, including designation of the regulated hazardous waste management unit.



Tank 77-78		Transfer Lines and Valves			
Drawn by T. Jones 7/10/2006		Elan Chemical			
		268 Doremus Ave			
		Newark, NJ			
		SIZE	FSCM NO	DWG NO	REV
				HZW-01	1
		SCALE	1 : 1	SHEET	1 OF 1

RESPONSE TO ALLEGED NOVs
& IRLs

ATTACHMENT 14

Copies of MSDS of Solvents Used in
Manufacturing

Elan Chemical Company, Inc.
Newark, NJ

**1. MATERIAL AND COMPANY IDENTIFICATION**

Material Name : Heptane
Uses : Industrial Solvent.
Product Code : Q1352
Company : Shell Chemical LP
PO Box 2463
HOUSTON TX 77252-2463
USA
MSDS Request : 1-800-240-6737
Customer Service : 1-866-897-4355

Emergency Telephone Number
Chemtrec Domestic : 1-800-424-9300
(24 hr)
Chemtrec : 1-703-527-3887
International (24 hr)

Other Information : PR.nr., 36485

2. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No.	Concentration
Solvent Naphtha (Petroleum), Light Aliphatic	64742-89-8	100.00 %

Contains n-Heptane, CAS # 142-82-5

3. HAZARDS IDENTIFICATION

	Emergency Overview
Appearance and Odour	: Colourless. Liquid. Paraffinic.
Health Hazards	: Vapours may cause drowsiness and dizziness. Irritating to skin. Harmful: may cause lung damage if swallowed.
Safety Hazards	: Extremely flammable. Vapours are heavier than air. Vapours may travel across the ground and reach remote ignition sources causing a flashback fire danger.
Environmental Hazards	: Toxic to aquatic organisms. May cause long-term adverse effects in the aquatic environment.

Health Hazards
Inhalation : Vapours expected to be slightly irritating. Vapours may cause drowsiness and dizziness.
Skin Contact : Irritating to skin. Repeated exposure may cause skin dryness or cracking.
Eye Contact : Vapours may be irritating to the eye.
Ingestion : Harmful: may cause lung damage if swallowed.
Other Information : Possibility of organ or organ system damage from prolonged



exposure; see Chapter 11 for details. Target organ(s):
Cardiovascular system.
Central nervous system (CNS).

- Signs and Symptoms** : Respiratory irritation signs and symptoms may include a temporary burning sensation of the nose and throat, coughing, and/or difficulty breathing. Breathing of high vapour concentrations may cause central nervous system (CNS) depression resulting in dizziness, light-headedness, headache, nausea and loss of coordination. Continued inhalation may result in unconsciousness and death. Skin irritation signs and symptoms may include a burning sensation, redness, swelling, and/or blisters. If material enters lungs, signs and symptoms may include coughing, choking, wheezing, difficulty in breathing, chest congestion, shortness of breath, and/or fever.
- Aggravated Medical Condition** : Pre-existing medical conditions of the following organ(s) or organ system(s) may be aggravated by exposure to this material: Skin.
- Environmental Hazards** : Expected to be toxic to aquatic organisms. May cause long-term adverse effects in the aquatic environment.

4. FIRST AID MEASURES

- General Information** : In general no treatment is necessary, however, obtain medical advice.
- Inhalation** : Remove to fresh air. If rapid recovery does not occur, transport to nearest medical facility for additional treatment.
- Skin Contact** : Remove contaminated clothing. Flush exposed area with water and follow by washing with soap if available.
- Eye Contact** : Flush eyes with water while holding eyelids open. Rest eyes for 30 minutes. If redness, burning, blurred vision, or swelling persist, transport to the nearest medical facility for additional treatment.
- Ingestion** : If swallowed, do not induce vomiting; transport to nearest medical facility for additional treatment. If vomiting occurs spontaneously, keep head below hips to prevent aspiration.
- Advice to Physician** : Causes central nervous system depression. Dermatitis may result from prolonged or repeated exposure. Potential for chemical pneumonitis. Consider: gastric lavage with protected airway, administration of activated charcoal.

5. FIRE FIGHTING MEASURES

Clear fire area of all non-emergency personnel.

- Flash point** : $< -7^{\circ}\text{C} / 19^{\circ}\text{F}$
- Explosion / Flammability limits in air** : 1 - 7 % (V)
- Auto Ignition temperature** : $246 - 260^{\circ}\text{C} / 475 - 500^{\circ}\text{F}$ (ASTM E-659)
- Specific Hazards** : Carbon monoxide may be evolved if incomplete combustion occurs. Will float and can be reignited on surface water. The vapour is heavier than air, spreads along the ground and



- Extinguishing Media** : distant ignition is possible.
Foam, water spray or fog. Dry chemical powder, carbon dioxide, sand or earth may be used for small fires only. Do not discharge extinguishing waters into the aquatic environment.
- Unsuitable Extinguishing Media** : Do not use water in a jet.
- Protective Equipment for Firefighters** : Wear full protective clothing and self-contained breathing apparatus.
- Additional Advice** : Keep adjacent containers cool by spraying with water.

6. ACCIDENTAL RELEASE MEASURES

Observe all relevant local and international regulations.

- Protective measures** : Avoid contact with spilled or released material. Immediately remove all contaminated clothing. For guidance on selection of personal protective equipment see Chapter 8 of this Material Safety Data Sheet. For guidance on disposal of spilled material see Chapter 13 of this Material Safety Data Sheet. Shut off leaks, if possible without personal risks. Remove all possible sources of ignition in the surrounding area. Use appropriate containment (of product and fire fighting water) to avoid environmental contamination. Prevent from spreading or entering drains, ditches or rivers by using sand, earth, or other appropriate barriers. Attempt to disperse the vapour or to direct its flow to a safe location for example by using fog sprays. Take precautionary measures against static discharge. Ensure electrical continuity by bonding and grounding (earthing) all equipment.
- Clean Up Methods** : For small liquid spills (< 1 drum), transfer by mechanical means to a labelled, sealable container for product recovery or safe disposal. Allow residues to evaporate or soak up with an appropriate absorbent material and dispose of safely. Remove contaminated soil and dispose of safely.
For large liquid spills (> 1 drum), transfer by mechanical means such as vacuum truck to a salvage tank for recovery or safe disposal. Do not flush away residues with water. Retain as contaminated waste. Allow residues to evaporate or soak up with an appropriate absorbent material and dispose of safely. Remove contaminated soil and dispose of safely.
- Additional Advice** : See Chapter 13 for information on disposal. Notify authorities if any exposure to the general public or the environment occurs or is likely to occur. Vapour may form an explosive mixture with air. U.S. regulations may require reporting releases of this material to the environment which exceed the reportable quantity (refer to Chapter 15) to the National Response Centre at (800) 424-8802. Under Section 311 of the Clean Water Act (CWA) this material is considered an oil. As such, spills into surface waters must be reported to the National Response Centre at (800) 424-8802. This material is covered by EPA's Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Petroleum Exclusion. Therefore,



releases to the environment may not be reportable under CERCLA.

7. HANDLING AND STORAGE

- General Precautions** : Avoid breathing of or contact with material. Only use in well ventilated areas. Wash thoroughly after handling. For guidance on selection of personal protective equipment see Chapter 8 of this Material Safety Data Sheet. Use the information in this data sheet as input to a risk assessment of local circumstances to help determine appropriate controls for safe handling, storage and disposal of this material.
- Handling** : Avoid contact with skin, eyes, and clothing. Ensure electrical continuity by bonding and grounding (earthing) all equipment. Restrict line velocity during pumping in order to avoid generation of electrostatic discharge (≤ 1 m/sec until fill pipe submerged to twice its diameter, then ≤ 7 m/sec). Avoid splash filling. Do NOT use compressed air for filling, discharging, or handling operations. The vapour is heavier than air, spreads along the ground and distant ignition is possible. Extinguish any naked flames. Do not smoke. Remove ignition sources. Avoid sparks. Handle and open container with care in a well-ventilated area. Ventilate workplace in such a way that the Occupational Exposure Limit (OEL) is not exceeded. Do not empty into drains. Avoid handling above its flashpoint otherwise the product will form flammable/explosive vapour-air mixtures
- Storage** : Must be stored in a diked (bunded) well-ventilated area, away from sunlight, ignition sources and other sources of heat. Storage Temperature: Ambient. Keep away from aerosols, flammables, oxidizing agents, corrosives and from other flammable products which are not harmful or toxic to man or to the environment.
- Product Transfer** : Keep containers closed when not in use. Do not use compressed air for filling, discharging or handling.
- Recommended Materials** : For containers, or container linings use mild steel, stainless steel. For container paints, use epoxy paint, zinc silicate paint.
- Unsuitable Materials** : Avoid prolonged contact with natural, butyl or nitrile rubbers.
- Container Advice** : Containers, even those that have been emptied, can contain explosive vapours. Do not cut, drill, grind, weld or perform similar operations on or near containers.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Occupational Exposure Limits

In the absence of occupational exposure standards for this product, it is recommended that the following are adopted.

Material	Source	Type	ppm	mg/m3	Notation
n-Heptane	ACGIH	TWA	400 ppm		



	ACGIH	STEL	500 ppm		
	OSHA Z1	PEL	500 ppm	2,000 mg/m3	
	OSHA Z1A	TWA	400 ppm	1,600 mg/m3	
	OSHA Z1A	STEL	500 ppm	2,000 mg/m3	
Stoddard Solvent	ACGIH	TWA	100 ppm		
	OSHA Z1	PEL	500 ppm	2,900 mg/m3	
	OSHA Z1A	TWA	100 ppm	525 mg/m3	

- Additional Information** : Shell has adopted as Interim Standards, the OSHA PELs that were established in 1989 and later rescinded.
Wash hands before eating, drinking, smoking and using the toilet.
- Exposure Controls** : The level of protection and types of controls necessary will vary depending upon potential exposure conditions. Select controls based on a risk assessment of local circumstances.
Appropriate measures include: Adequate explosion-proof ventilation to control airborne concentrations below the exposure guidelines/limits. Eye washes and showers for emergency use.
- Personal Protective Equipment** : Personal protective equipment (PPE) should meet recommended national standards. Check with PPE suppliers.
- Respiratory Protection** : If engineering controls do not maintain airborne concentrations to a level which is adequate to protect worker health, select respiratory protection equipment suitable for the specific conditions of use and meeting relevant legislation. Check with respiratory protective equipment suppliers. Where air-filtering respirators are suitable, select an appropriate combination of mask and filter. Select a filter suitable for organic gases and vapours [boiling point >65 °C (149 °F)] meeting EN141. Where air-filtering respirators are unsuitable (e.g., airborne concentrations are high, risk of oxygen deficiency, confined space) use appropriate positive pressure breathing apparatus.
- Hand Protection** : Where hand contact with the product may occur the use of gloves approved to relevant standards (e.g. Europe: EN374, US: F739) made from the following materials may provide suitable chemical protection:
Longer term protection: Nitrile rubber gloves
Incidental contact/Splash protection: PVC or neoprene rubber gloves
- Eye Protection** : Chemical splash goggles (chemical monogoggles).
- Protective Clothing** : Use protective clothing which is chemical resistant to this material. Safety shoes and boots should also be chemical resistant.
- Monitoring Methods** : Monitoring of the concentration of substances in the breathing zone of workers or in the general workplace may be required to confirm compliance with an OEL and adequacy of exposure controls. For some substances biological monitoring may also be appropriate. Occupational Safety and Health Administration (OSHA), USA: Sampling and Analytical Methods
<http://www.osha-slc.gov/dts/sltc/methods/toc.html> Health and



Safety Executive (HSE), UK: Methods for the Determination of Hazardous Substances <http://www.hsl.gov.uk/search.htm>
Examples of sources of recommended air monitoring methods are given below or contact supplier. Further national methods may be available. National Institute of Occupational Safety and Health (NIOSH), USA: Manual of analytical Methods <http://www.cdc.gov/niosh/nmam/nmammenu.html>

Environmental Exposure Controls : Local guidelines on emission limits for volatile substances must be observed for the discharge of exhaust air containing vapour.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	: Colourless. Liquid.
Odour	: Paraffinic.
Boiling point	: 90 - 100 °C / 194 - 212 °F
Flash point	: < -7 °C / 19 °F
Explosion / Flammability limits in air	: 1 - 7 % (V)
Auto-ignition temperature	: 246 - 260 °C / 475 - 500 °F (ASTM E-659)
Vapour pressure	: 6 - 7.7 kPa at 20 °C / 68 °F
Specific gravity	: 0.7 - 0.71 at 20 °C / 68 °F
Density	: Typical 713 kg/m ³ at 15 °C / 59 °F (ASTM D-4052)
Water solubility	: 2.6 mg/l at 25 °C / 77 °F Immiscible.

10. STABILITY AND REACTIVITY

Stability	: Stable under normal conditions of use.
Conditions to Avoid	: Avoid heat, sparks, open flames and other ignition sources.
Materials to Avoid	: Strong oxidising agents.
Hazardous Decomposition Products	: Thermal decomposition is highly dependent on conditions. A complex mixture of airborne solids, liquids and gases, including carbon monoxide, carbon dioxide and other organic compounds will be evolved when this material undergoes combustion or thermal or oxidative degradation.

11. TOXICOLOGICAL INFORMATION

Basis for Assessment	: Information given is based on product testing, and/or similar products, and/or components.
Acute Oral Toxicity	: Expected to be of low toxicity: LD50 >2000 mg/kg, Rat Aspiration into the lungs when swallowed or vomited may cause chemical pneumonitis which can be fatal.
Acute Dermal Toxicity	: Expected to be of low toxicity: LD50 >2000 mg/kg, Rat
Acute Inhalation Toxicity	: Expected to be of low toxicity: LC50 >5000 ppm / 1 hours, Rat High concentrations may cause central nervous system depression resulting in headaches, dizziness and nausea; continued inhalation may result in unconsciousness and/or death.
Skin Irritation	: Irritating to skin.
Eye Irritation	: Expected to be non-irritating to eyes.
Sensitisation	: Not expected to be a skin sensitizer.



Repeated Dose Toxicity : Cardiovascular system: chronic abuse of similar materials has been associated with irregular heart rhythms and cardiac arrest.
Central nervous system: repeated exposure affects the nervous system. Kidney: caused kidney effects in male rats which are not considered relevant to humans

12. ECOLOGICAL INFORMATION**Acute Toxicity**

Fish : Expected to be toxic: $1 < LC/EC/IC50 \leq 10 \text{ mg/l}$
Aquatic Invertebrates : Expected to be toxic: $1 < LC/EC/IC50 \leq 10 \text{ mg/l}$
Algae : Expected to be toxic: $1 < LC/EC/IC50 \leq 10 \text{ mg/l}$
Microorganisms : Expected to be toxic: $1 < LC/EC/IC50 \leq 10 \text{ mg/l}$

Mobility : Floats on water.
Adsorbs to soil and has low mobility.
Persistence/degradability : Readily biodegradable.
Oxidises rapidly by photo-chemical reactions in air.
Bioaccumulation : Has the potential to bioaccumulate.
Other Adverse Effects :

13. DISPOSAL CONSIDERATIONS

Material Disposal : Recover or recycle if possible. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste classification and disposal methods in compliance with applicable regulations.
Container Disposal : Drain container thoroughly. After draining, vent in a safe place away from sparks and fire. Residues may cause an explosion hazard. Do not puncture, cut or weld uncleaned drums. Send to drum recoverer or metal reclaimer.
Local Legislation : Disposal should be in accordance with applicable regional, national, and local laws and regulations. Local regulations may be more stringent than regional or national requirements and must be complied with.

14. TRANSPORT INFORMATION**US Department of Transportation Classification (49CFR)**

Identification number UN 1206
Proper shipping name Heptanes
Class / Division 3
Packing group II
Contains OIL
Emergency Response Guide No. 128
Additional Information

This material is an 'OIL' under 49 CFR Part 130 when transported in a container of 3500 gallon capacity or greater.

**Material Safety Data Sheet****IMDG**

Identification number	UN 1206
Proper shipping name	HEPTANES
Class / Division	3
Packing group	II
Marine pollutant:	No

IATA (Country variations may apply)

Identification number	UN 1206
Proper shipping name	Heptanes
Class / Division	3
Packing group	II

15. REGULATORY INFORMATION

The regulatory information is not intended to be comprehensive. Other regulations may apply to this material.

Federal Regulatory Status**Notification Status**

AICS	Listed.
DSL	Listed.
INV (CN)	Listed.
TSCA	Listed.
EINECS	Listed. 265-192-2
KECI (KR)	Listed. KE-31661
PICCS (PH)	Listed.

Comprehensive Environmental Release, Compensation & Liability Act (CERCLA)

Heptane (64742-49-0)	Reportable quantity: 12,821 lbs
Cyclohexane (110-82-7)	Reportable quantity: 1,000 lbs
n-Hexane (110-54-3)	Reportable quantity: 5,000 lbs
Toluene (108-88-3)	Reportable quantity: 1,000 lbs

Shell classifies this material as an "oil" under the CERCLA Petroleum Exclusion, therefore releases to the environment are not reportable under CERCLA. The components with RQs are given for information.

Clean Water Act (CWA) Section 311

Cyclohexane (110-82-7)	Reportable quantity: 1,000 lbs
Toluene (108-88-3)	Reportable quantity: 1,000 lbs

Under Section 311 of the Clean Water Act (CWA) this material is considered an oil. As such, spills into surface waters must be reported to the National Response Centre at (800) 424-8802. The components with RQs are given for information.



Shell Chemicals

Material Safety Data Sheet

Heptane

MSDS# 7246

Version 11.5

Effective Date 11/29/2005

According to OSHA Hazard Communication Standard, 29 CFR
1910.1200

SARA Hazard Categories (311/312)

Immediate (Acute) Health Hazard. Fire Hazard.

SARA Toxic Release Inventory (TRI) (313)

Cyclohexane (110-82-7)	7.80%
n-Hexane (110-54-3)	0.50%
Toluene (108-88-3)	0.005%

State Regulatory Status

California Safe Drinking Water and Toxic Enforcement Act (Proposition 65)

Known to the State of California to cause birth defects or other reproductive harm.

Toluene (108-88-3) 0.005%	Developmental toxin.
---------------------------	----------------------

New Jersey Right-To-Know Chemical List

n-Heptane (142-82-5) 40.00%	Listed.
Cyclohexane (110-82-7) 7.80%	
n-Hexane (110-54-3) 0.50%	
Octane (111-65-9) 0.10%	Listed.
Toluene (108-88-3) 0.005%	

Pennsylvania Right-To-Know Chemical List

n-Heptane (142-82-5) 40.00%	Listed.
Cyclohexane (110-82-7) 7.80%	Environmental hazard.
	Listed.
n-Hexane (110-54-3) 0.50%	Listed.
Octane (111-65-9) 0.10%	Listed.
Toluene (108-88-3) 0.005%	Environmental hazard.
	Listed.

16. OTHER INFORMATION

HMIS Rating (Health, Fire, : 1, 3, 0

Reactivity)

NFPA Rating (Health, : 1, 3, 0

Fire, Reactivity)

MSDS Version Number : 11.5

MSDS Effective Date : 11/29/2005

MSDS Revisions : A vertical bar (|) in the left margin indicates an amendment
from the previous version.



Shell Chemicals

Material Safety Data Sheet

Heptane

MSDS# 7246

Version 11.5

Effective Date 11/29/2005

According to OSHA Hazard Communication Standard, 29 CFR 1910.1200

- MSDS Regulation** : The content and format of this MSDS is in accordance with the OSHA Hazard Communication Standard, 29 CFR 1910.1200.
- Uses and Restrictions** : Industrial Solvent.
- MSDS Distribution** : The information in this document should be made available to all who may handle the product
- Disclaimer** : The information contained herein is based on our current knowledge of the underlying data and is intended to describe the product for the purpose of health, safety and environmental requirements only. No warranty or guarantee is expressed or implied regarding the accuracy of these data or the results to be obtained from the use of the product.

received

1/10/06